

Exhibit A

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IN THE MATTER OF INDEPENDENT INVESTIGATION
UNDER EXECUTIVE LAW 63(8)

May 26, 2021
10:05 a.m.

VIDEOCONFERENCE INVESTIGATION of
CHARLOTTE BENNETT, taken by The New York
Attorney General's Office pursuant to
Notice, held via Zoom videoconference,
before Wayne Hock, a Notary Public of the
State of New York.

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1

2 APPAREANCES:

3

4 CLEARY GOTTLIEB STEEN & HAMILTON LLP
5 One Liberty Plaza
6 New York, New York 10006

7

8 BY: JOON R. KIM, ESQ.
9 (via videoconference)
10 JENNIFER KENNEDY PARK, ESQ.
11 (via videoconference)

12

VLADECK, RASKIN & CLARK, PC
13 Attorneys Representing the New York
14 State Attorney General's Office
15 565 Fifth Avenue
16 New York, New York 10017

17

18 BY: ANNE L. CLARK, ESQ.
19 (via videoconference)
20 EMILY G. MILLER, ESQ.
21 (via videoconference)

22

KATZ, MARSHALL & BANKS, LLP
23 Attorneys for WITNESS
24 1718 Connecticut Avenue, NW
25 Washington, D.C. 20009

BY: DEBRA S. KATZ, ESQ.

26

27 ALSO PRESENT:

28

29 TOM DEVINE, Videographer
30 (via videoconference)

31 * * *

32

33

34

35

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1

2 THE VIDEOGRAPHER: Good morning.

3

4 We're going on the record at 10:05
5 a.m. on May 26, 2021.

6

7 This is media unit one of the
8 video recorded deposition of witness
9 of May 26, 2021 in the matter of
10 Independent Investigation Under
11 Executive Law 63(8).

12

13 This deposition is being held
14 online as a Zoom videoconference with
15 all parties appearing remotely.

16

17 My name IS Thomas Devine from
18 the firm Veritext New York, and I am
19 the videographer.

20

21 The court reporter is Wayne Hock
22 also with Veritext New York.

23

24 I am not authorized to
25 administer an oath, I am not related
 to any party in this action, nor am I
 financially interested in the outcome.

26

27 Counsel appearing remotely will
28 now state their appearances and
29 affiliations for the record.

30

31 If there are any objections to

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1

2 proceeding, please state them at the
3 time of your appearance, beginning
4 with the noticing attorney.

5

6 After appearances have been
7 noted, the court reporter will swear
in the witness and we may proceed.

8

9 MS. CLARK: Hi, I'm Anne Clark,
10 I'm with the law firm of Vladreck,
Raskin and Clark, but I'm appearing
11 today as special deputy to the First
12 Deputy Attorney General.

13

Joon?

14

15 MR. KIM: Hi, I'm Joon Kim from
the law firm of Cleary Gottlieb. Like
16 Anne, I'm appearing as a special
assistant to the First Deputy Attorney
17 General in this investigation.

18

MS. CLARK: Emily?

19

20 MS. MILLER: Hi, I'm Emily
Miller. I'm with the law firm of
21 Vladreck, Raskin and Clark, and like
Anne and Joon, I'm appearing with the
22 Attorney General's investigation.

23

MS. CLARK: And Debra?

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1

2 MS. KATZ: I'm Debra Katz with
3 the law firm of Katz, Marshall and
4 Banks in Washington, D.C. and
5 appearing on behalf of Charlotte
6 Bennett this morning.

7

MS. CLARK: Okay.

8

You can swear the witness.

9

C H A R L O T T E B E N N E T T, having
10 been first duly sworn by a
11 Notary Public of the State of
12 New York, upon being examined,
13 testified as follows:

14

EXAMINATION BY

15

MS. CLARK:

16

Q. Okay.

17

Good morning. Thank you for
18 meeting with us today. As I just said, my
19 name is Anne Clark, and I have been
20 appointed as special deputy to the First
21 Deputy Attorney General.

22

The Attorney General has
23 appointed my law firm Vladeck, Raskin and
24 Clark and the law firm of Cleary,
25 Gottlieb, Steen and Hamilton to conduct an

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1 C. Bennett
2 independent investigation under New York
3 Executive Law Section 63(8) into
4 allegations of sexual harassment brought
5 against Governor Andrew Cuomo as well as
6 the surrounding circumstances.

7 As was noted, we are being video
8 recorded today.

9 You are also under oath, which
10 means you must testify accurately and
11 truthfully, just as if you were sitting in
12 front of a judge or jury, and your
13 testimony is subject to penalty of
14 perjury.

15 At the end I'll remind you if
16 you want to make a sworn statement to
17 address anything that we didn't cover that
18 you'd like on the record, we'll give you
19 an opportunity to do that.

20 This is a civil investigation,
21 but we just have to put you on notice that
22 the Attorney General's office also has
23 criminal enforcement powers, so if at any
24 point you want to refuse to answer a
25 question that would incriminate you, you

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1 C. Bennett
2 may do so. Failure to answer a question
3 can be held against you in a civil
4 proceedings, not in a criminal proceeding.

5 You are appearing today with
6 your attorney present. You may consult
7 with your attorney about privileged
8 matters, but otherwise she is here to just
9 observe and be there if you need to talk
10 to her.

11 We have a court reporter with us
12 today virtually, and as he noted, he needs
13 to take down everything that we're saying.
14 So, as he said, it is very important that
15 we not speak over each other. It can be
16 hard to do. I will do my very best to
17 wait until you finished talking before I
18 ask my next question. When I'm asking a
19 question, even if you think you know where
20 I'm headed, just wait until I get the
21 whole question out.

22 If you don't understand a
23 question that I ask, let me know and I'll
24 try to rephrase it in a way that makes
25 more sense.

1 C. Bennett

2 You are not going to be given a
3 transcript of this and a chance to review
4 it, but if, during the course of the day,
5 you remember that something you said
6 earlier isn't fully accurate or you
7 remember some additional information, for
8 example if we're talking about somebody's
9 name and you don't remember it when we're
10 first talking about it, if you remember it
11 later, feel free to just say, oh, I just
12 remembered that person was John Smith.

13 If I ask you about details that
14 you don't recall, if you can approximate
15 -- so if it's a name and you remember the
16 first name but not the last name, that's
17 great, or if it's a date, if you remember
18 approximately when it happened, the more
19 specific it can be the better, but we
20 don't want you to guess.

21 We will take breaks. Any time
22 you need a break, just say so. I want you
23 to answer whatever question is pending,
24 but we can take breaks as often as you'd
25 like.

1 C. Bennett

2 I know you were in the room with
3 us --

4 MS. CLARK: Debbie, is anyone in
5 the room with you?

6 MS. KATZ: No.

7 MS. CLARK: And then we also want
8 to confirm that nobody is using any
9 technology to make their own
10 recording. We're making a recording,
11 but neither you, Charlotte, nor
12 Debbie, you aren't doing anything to
13 record today's proceedings; is that
14 correct?

15 MS. KATZ: That's correct.

16 Q. And then we need to advise you
17 that you should not be during breaks
18 telling anyone what's going on outside of
19 these proceedings. And I just want to
20 advise you that, under Executive
21 Law 63(8), the provision under which we're
22 doing the investigation, you and your
23 attorney should not be telling anyone what
24 we discuss today. Obviously you can and
25 have talked about the underlying events,

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1 C. Bennett
2 but in terms of what subjects we touched
3 upon, that is to be kept confidential. If
4 anyone asks you what we talked about, you
5 should let us know and we will address
6 that.

7 Are you taking any medication
8 that would affect your ability to testify
9 accurately and truthfully today?

10 A. No.

11 Q. Have you had any alcohol today?

12 A. No.

13 Q. Is there any other reason why
14 you couldn't testify accurately and
15 truthfully today?

16 A. No.

17 Q. For the record, could you state
18 your name, date of birth, and current home
19 and business addresses.

20 A. My name is Charlotte Bennett. I
21 was born [REDACTED] [REDACTED] [REDACTED].

22 My current address is [REDACTED]
23 [REDACTED] [REDACTED] [REDACTED] [REDACTED], and I list
24 also my parents' home address, [REDACTED]
25 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED].

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1 C. Bennett

2 Q. Are you currently working
3 anywhere?

4 A. I am fully remote permanently.

5 Q. Have you ever given testimony
6 before in either a deposition or any sort
7 of trial or arbitration or anything like
8 that?

9 A. No.

10 Q. Other than speaking with your
11 attorney, have you done anything to
12 prepare for today's testimony?

13 A. Review my documents, the ones
14 that we handed to you.

15 Q. And have you spoken with anyone
16 other than your attorney about what you're
17 going to say today?

18 A. No.

19 Q. We'll start by just going over
20 some background.

21 Did you attend college?

22 A. Yes.

23 Q. What college did you attend?

24 A. Hamilton College.

25 Q. And did you receive a degree

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1 C. Bennett

2 from Hamilton?

3 A. Yes.

4 Q. In what?

5 A. Women's and gender studies.

6 Q. What year did you get your
7 degree?

8 A. 2017.

9 Q. And why don't you just walk us
10 through your employment history from
11 college until you came to work for the
12 State of New York.

13 A. My first job out of college was
14 an internship at Cornerstone Government
15 Affairs in Washington, D.C. I was hired
16 by that firm as an associate in December
17 of 2017. I worked as an associate in
18 public health until I left the firm in the
19 fall of 2018. And then I was hired by the
20 Cuomo Administration in -- officially in
21 January, 2019.

22 Q. And how did you come to work for
23 the Cuomo Administration?

24 A. The firm I had left was in
25 contact with a former client that was now

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1 C. Bennett
2 working in the Cuomo Administration, and
3 they were looking for resumés.

4 Q. And who is the former client?

5 A. [REDACTED] [REDACTED] [REDACTED].

6 Q. And to whom did you send your
7 resumé?

8 A. [REDACTED] [REDACTED].

9 Q. And what was her role?

10 A. She was a lobbyist at
11 [REDACTED] [REDACTED] [REDACTED].

12 Q. And were you applying for any
13 specific position, or just passing along
14 your resumé? What was your intention when
15 you sent it to her?

16 A. Passing along a resumé.

17 Q. And what was the next thing that
18 happened in connection with you going to
19 work for the Cuomo Administration?

20 A. I was e-mailed by [REDACTED]
21 [REDACTED], a staffer for the Cuomo
22 Administration, and he wanted to talk on
23 the phone about a specific position that
24 they were interested in filling.

25 Q. And what was that position?

1 C. Bennett

2 A. Briefer.

3 Q. And did he tell you what being a
4 briefer involved?

5 A. On the phone when we spoke, yes.

6 Q. What did he tell you the role of
7 a briefer was?

8 A. He didn't have much contact with
9 the briefing team, so his description was
10 relatively brief and I wouldn't say
11 particularly accurate. He seemed to
12 appreciate that I lived close to the
13 Governor's house in Mount Kisco. He
14 explained that part of the job would
15 potentially be driving to his house to
16 drop materials off, and even in that first
17 introductory phone call mentioned that
18 maybe they will provide me with a printer
19 at my house in case I need to provide him
20 materials from my parents' house in
21 [REDACTED] to his house in Mount Kisco. He
22 described the larger job description as
23 providing a daily book of materials to the
24 Governor, staying on top of his schedule,
25 and information gathering.

C. Bennett

Q. And you said he didn't seem that familiar with the role of briefer.

What was his role?

5 A. It wasn't so much that he wasn't
6 familiar, but when I started the job, it
7 was clear that everyone was confused why
8 my interview was with him originally, and
9 that he didn't really work alongside the
10 briefing team and they didn't understand
11 what he had described on the phone,
12 because they don't.

(Whereupon Ms. Kennedy Park

entered the proceedings)

15 Q. What was it that his role was?
16 What did he do?

17 A. He was on one of the policy
18 teams. He worked under David Yassky, who
19 was the policy lead in the office.

20 Q. And after you spoke with him,
21 did you interview with anyone else before
22 he offered you the job?

23 A. I scheduled an interview with
24 Jill Desrosiers. Late December I went to
25 the office 633 and had an interview with

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1 C. Bennett

2 Jill Desrosiers and [REDACTED] [REDACTED].

3 Q. And what were their roles?

4 A. Jill Desrosiers was the chief of
5 staff, and [REDACTED] [REDACTED] was -- I don't
6 remember her particular title, but she
7 handled appointments.

8 Q. And did they tell you anything
9 about what the role was that you were
10 being considered for?

11 A. They explained a little bit, but
12 I don't remember in particular detail.

13 Q. And after you interviewed with
14 them, did you interview with anyone else
15 before being offered the position?

16 A. No.

17 Q. And who made you the offer?

18 A. [REDACTED] [REDACTED] called me.

19 Q. And did you accept right away,
20 or did you take some time to think about
21 it?

22 A. I accepted immediately.

23 Q. And after you started the
24 process of interviewing for this job, did
25 you talk to anyone outside of those you

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1 C. Bennett
2 interviewed with about what it was like to
3 work for the administration or in the
4 Executive Chamber?

5 A. I spoke again with [REDACTED]
6 [REDACTED] as a part of my onboarding and
7 background check process. He told me to
8 see all the doctors that I could before my
9 start date, and that was the only
10 indication before working in the
11 administration. He indicated that I would
12 not have time to go to the doctor, and
13 that to me sent a very strong message.

14 Q. Did you ask anyone else about
15 what the schedule was like after he made
16 that comment to you?

17 A. Not that I can remember right
18 now.

19 Q. So you said you started in
20 January, 2019; correct?

21 A. Correct.

22 Q. And where were you based?

23 A. New York City.

24 Q. And the offices at 633 Third
25 Avenue?

1 C. Bennett

2 A. Correct.

3 Q. Where was your office when you
4 were a briefer?

5 A. I originally started on the
6 thirty-eighth floor. I had a cubicle just
7 on the thirty-eighth floor from January,
8 2019 when I started until May, 2019.

9 Q. And where was the Governor's
10 office located?

11 A. The thirty-ninth floor.

12 Q. And who did you sit near when
13 you were on the thirty-eighth floor?

14 A. I sat near the other briefer,
15 [REDACTED], [REDACTED], who at the
16 time was on the advanced team, and [REDACTED]
17 [REDACTED], so -- I may have gotten her name
18 wrong. She at the time was on the
19 advanced team.

20 Q. And you mentioned [REDACTED]
21 [REDACTED].

22 Were the two of you the only two
23 briefers when you joined?

24 A. There was a briefer in Albany,
25 [REDACTED] [REDACTED], who was preparing to

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1 C. Bennett
2 leave the briefing team, and a new briefer
3 who had the same start date that I did who
4 was also based out of Albany.

5 Q. Who was the new briefer?

6 A. I don't remember her name right
7 now.

8 Q. When you started, did you
9 receive any orientation or training?

10 A. I received an orientation -- we
11 received a binder of materials and sat in
12 a small conference room with other new
13 hires of all levels, went through a quick
14 PowerPoint, covered I think mostly ethics.
15 I don't remember exactly the topics.

16 Q. Who led the training that you
17 attended?

18 A. I don't remember right now.

19 Q. You said you were given a
20 binder.

21 Do you recall what sort of
22 materials were in the binder?

23 A. I don't remember, I'm sorry.

24 Q. Did you receive any training
25 when you joined about sexual harassment?

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1 C. Bennett

2 A. No.

3 Q. At any later points, did you
4 receive any training about sexual
5 harassment?

6 A. No, not that I recall.

7 Q. Were you aware of anyone else
8 undergoing any sexual harassment training,
9 either in person or online?

10 A. I was aware that Stephanie
11 Benton completed a sexual harassment
12 training on behalf of the Governor at some
13 point in 2019.

14 Q. And where was Ms. Benton when
15 she did that training for the Governor?

16 A. At her desk at 633 on the
17 thirty-ninth floor.

18 Q. And did you observe her taking
19 the training?

20 A. No, I was at my desk.

21 Q. Where was your desk in relation
22 to her desk?

23 A. I sat at a cubicle directly at
24 the entrance of her office.

25 Q. And so this is after you moved

1 C. Bennett

2 from the thirty-eighth floor to the
3 thirty-ninth floor?

4 A. Correct.

5 Q. If you did not observe her
6 taking the training, how do you know she
7 was taking the sexual harassment training
8 on behalf of the Governor? What did you
9 observe or hear?

10 A. She was speaking about
11 completing it for him. I don't remember
12 the particular details of her comments,
13 but it was a very obvious and jarring
14 moment for me.

15 Q. Was anyone else present other
16 than you when Ms. Benton was talking about
17 having completed the training for the
18 Governor?

19 A. She was speaking to the Governor
20 at the time.

21 Q. Was he on the phone or in the
22 office or somewhere else?

23 A. He was at his desk.

24 Q. And if you could describe sort
25 of the setup, where you sat, she sat, he

1 C. Bennett

2 sat.

3 A. Stephanie Benton and the
4 Governor can see each other from their
5 respective desks. Stephanie is facing a
6 wall. On the other side of the wall is
7 where my cube is. So I was seated next to
8 her door just outside her office and was
9 listening to her exchange behind me with
10 the Governor.

11 Q. And do you recall anything that
12 she or the Governor said about her doing
13 this training?

14 A. I don't want to say any
15 particular details because the exact
16 interaction I don't remember.

17 Q. And did the Governor have to
18 sign any document attesting to having
19 taken the training?

20 A. Yes.

21 Q. And what do you know about that?

22 A. He signed the certificate that
23 she presented out at the end of the
24 training, and I scanned it and sent it to
25 someone in the office. I don't remember

Page 23

1 C. Bennett
2 right now who that was. And then was told
3 to shred the certificate.

4 Q. Did you ever see Ms. Benton
5 taking sexual harassment training any
6 other time?

7 A. No.

8 Q. Did you ever see the Governor
9 taking sexual harassment training?

10 A. No.

11 Q. Prior to June of 2020, did you
12 ever see any sexual harassment policy that
13 governed the Chamber?

14 A. No.

15 Q. Were you told, when you started,
16 that there was any dress code?

17 A. Which position are you referring
18 to?

19 Q. First when you started as a
20 briefer, were you told anything about how
21 you should be dressing for work?

22 A. I was told that there was less
23 pressure generally because I did not have
24 face time with the Governor but that, on
25 days when you expected him in the office,

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1 C. Bennett
2 you should dress better and that you could
3 easily tell which days he happened to be
4 in the office based on the attire of
5 people around you.

6 Q. And who told you this when you
7 started?

8 A. I believe it was [REDACTED]
9 [REDACTED], but it wasn't such an
10 outlandish comment for the environment, so
11 it could have also been someone else or
12 additional people.

13 Q. And did either [REDACTED] [REDACTED]
14 or anyone else tell you, other than to
15 dress better when the Governor was around,
16 any particular way of dressing?

17 A. When I was hired to be his
18 executive assistant, I had already an
19 understanding that I was supposed to wear
20 heels. I went out and I purchased several
21 pairs of heels for the job that I was
22 hired for. And he -- I was told that he
23 cared deeply about your appearance and
24 would comment on it if he was not pleased
25 with it.

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1 C. Bennett

2 Q. And by the time you were hired
3 as an executive assistant, how did you
4 acquire this understanding that you should
5 be wearing heels, et cetera?

6 A. I believe my colleagues would
7 directly discuss that detail in addition
8 to seeing a colleague who worked on the
9 thirty-ninth floor come down and take her
10 heels off or make a comment about the fact
11 that she has to wear heels today. It was
12 very much a part of the environment.

13 Q. Were you told there were any
14 policies about either retaining or
15 deleting e-mails?

16 A. Yes.

17 Q. What were you told about that?

18 A. That we were meant to delete our
19 e-mails.

20 Q. Who told you that?

21 A. I believe that was mentioned.

22 So [REDACTED] and I
23 definitely had a conversation about it. I
24 remember because I was confused, and she
25 was at that time guiding me through my new

1 C. Bennett

2 job. But I believe, in addition to that,
3 it was a part of the orientation.

4 Q. And do you recall being told to
5 manually delete e-mails or there was a
6 setting you could use? What were you told
7 about the process?

8 A. I was told you were meant to set
9 in Outlook an automatically delete after X
10 time period.

11 Q. And do you recall what that time
12 period was?

13 A. No, because I disregarded the
14 policy.

15 Q. Did anyone ever direct you to
16 delete specific e-mails, not just after a
17 certain time period, but delete certain
18 e-mails on a particular subject?

19 A. Yes.

20 Q. And when did that happen?

21 A. I don't remember particular
22 instances, but there were moments when
23 discussions about private matters, like
24 relating to his campaign or personal
25 information, it was like we should delete

1 C. Bennett

2 this.

3 Q. And do you recall anyone who
4 told you to delete specific e-mails or
5 e-mails about specific subjects?

6 A. I don't recall.

7 Q. And when you were a briefer, did
8 you communicate directly with the Governor
9 at all?

10 A. Yes.

11 Q. And what means would you use to
12 communicate directly with the Governor
13 when you were a briefer?

14 A. I would PIN him on BlackBerry,
15 we spoke on the phone, and in person.

16 Q. And did you get a BlackBerry
17 when you were a briefer?

18 A. Correct, my first day.

19 Q. And you mentioned PINing the
20 Governor.

21 Did anyone tell you what the
22 preferred methods were for communicating
23 with the Governor?

24 A. Yes.

25 Q. What were you told?

1 C. Bennett

2 A. There was a very specific
3 procedure for communicating to him when
4 the briefing book arrived at his location.

5 Q. And what was the procedure?

6 A. I don't recall exactly, and I
7 believe it may have changed over time.

8 Q. Did anyone tell you about the
9 Governor having a preference forgetting
10 communications through BlackBerry PINs as
11 opposed to something else?

12 A. Yes.

13 Q. And who told you about that?

14 A. I don't remember exactly, but it
15 was very well-known that he was not one to
16 e-mail and that he only owned a
17 BlackBerry.

18 Q. Did anyone tell you why the
19 Governor preferred using BlackBerry PINs
20 as opposed to other methods of
21 communication?

22 A. It was fairly understood in the
23 office that he preferred BlackBerry PIN
24 because it was encrypted.

25 Q. And did you have any

1 C. Bennett
2 understanding as to whether the BlackBerry
3 PINs were preserved anywhere, the way
4 e-mails would be on a server or on a
5 device?

6 A. No.

7 Q. No, they weren't or no, you
8 didn't have an understanding?

9 A. I did not have an understanding.
10 Thank you.

11 Q. When you were a briefer, to whom
12 did you report?

13 A. Annabel Walsh.

14 Q. What was her role?

15 A. Director of scheduling.

16 Q. And when you were just in the
17 briefer role, what were your
18 responsibilities?

19 A. Those first few months of my
20 original job --

21 Q. As a briefer, yes.

22 A. I would research topics that he
23 was going to speak about, meet about. I
24 would research people he was going to meet
25 with, interact with. We collected

1 C. Bennett
2 biographies with the VIPs attending his
3 events. We organized briefings from
4 policy teams, from counsel's office, from
5 his regional reps as it related to his
6 day-to-day schedule.

7 Q. And once you gathered all this
8 information, what did you and the other
9 briefers do with it?

10 A. It was organized in a very, very
11 particular way. It had to look a certain
12 way. It was organized every day in a
13 particular manner, and we were essentially
14 the last stop, the last set of eyes, so
15 our job was to make sure that any
16 questions were answered in the briefing,
17 that it made sense, that it was thorough,
18 clear, easy to read, brief, and that it
19 contained his schedule.

20 Q. And was there a time of day by
21 which the book for the next day had to be
22 done?

23 A. That was -- that changed
24 throughout my job. We would have really
25 late books, and if that was an issue, we

1 C. Bennett
2 would get -- we would be told that was an
3 issue, now we need to have it by 6:00 p.m.
4 every day, as an example.

5 But no, technically there was no
6 deadline.

7 Q. And during the first few months
8 when you were just in the role of briefer,
9 did you have any interactions with the
10 Governor?

11 A. I attended his voting reform
12 press conference on January 24, 2019 was
13 my first day, and they were filling seats
14 in the press conference.

15 And then that same spring I was
16 sitting at my cubicle and he walked by and
17 waved, so I waved. He was on his way from
18 the press conference, the presser room,
19 and was getting up the stairs to
20 thirty-nine.

21 Q. So the presser room was on
22 thirty-eight where you had your cubicle?

23 A. Correct.

24 Q. And during this first few months
25 when you were just a briefer, any other

1 C. Bennett

2 interactions with the Governor?

3 A. No.

4 Q. And in those first few months,
5 did you ever do any work up in Albany?

6 A. Yes.

7 Q. How often did you go to Albany
8 just in the time you were in the briefer
9 role?

10 A. Less than ten.

11 Q. And were there specific events
12 or occasions that you went up for?

13 A. I went to Albany to help staff a
14 party at the Executive Mansion. I would
15 visit Albany to cover if there was no
16 Albany briefer available for a period of
17 time.

18 Q. And when you were covering when
19 there was not an Albany briefer available,
20 would you do that work at the Capitol
21 Building?

22 A. Correct.

23 Q. And you mentioned staffing a
24 party at the mansion.

25 During this period of time, did

1 C. Bennett

2 you go to the mansion on any other
3 occasions?

4 A. Early on in my tenure, no.

5 Q. And when you were just a
6 briefer, did you work weekends?

7 A. Yes.

8 Q. And how frequently did you work
9 weekends?

10 A. Most weekends.

11 Q. And on the weekends, what sort
12 of work were you doing on the weekends?
13 Was it also putting together a briefing
14 book, or was it something else?

15 A. Correct, still briefing book
16 work.

17 Q. And did there ever come a time
18 when you began to spend more time in
19 Albany?

20 A. There was a period of time in
21 which I was in Albany more. It was a
22 result of issues with the briefing team
23 not having enough staff and my work
24 directly with the Governor after I was
25 hired as his executive assistant.

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1 C. Bennett

2 Q. And when did you start spending
3 more time in Albany?

4 A. I would say July.

5 Q. Of 2019?

6 A. Of 2019.

7 Q. And when was there ever a period
8 of time when you were staying for an
9 extended period of time in Albany?

10 A. In 2019?

11 Q. At any point later.

12 A. For COVID I stayed in Albany
13 March 23, 2020 and I moved out of the
14 hotel room in July, 2020.

15 Q. What hotel were you staying in?

16 A. The [REDACTED]

17 Q. And who asked you to essentially
18 move up to Albany to this hotel during
19 that period?

20 A. Jill Desrosiers.

21 Q. And what was your reaction when
22 you were asked to move up to Albany during
23 the COVID period?

24 A. I was not surprised. I was very
25 scared of COVID, but I also expected that

1 C. Bennett

2 they would want me there.

3 Q. And was the Governor staying in
4 Albany during the COVID period?

5 A. Correct.

6 Q. Did you have -- did the
7 frequency of your interactions with the
8 Governor change during COVID?

9 A. Yes, I saw less of him.

10 Q. Did you ever complain to anyone
11 that you weren't getting enough face time
12 with the Governor?

13 A. Very possible, but I don't
14 remember particularly, no.

15 Q. Do you recall any period of time
16 where you felt you weren't getting enough
17 face time with the Governor?

18 A. It's possible that I was
19 frustrated, but I don't remember
20 particularly.

21 Q. Was it during the time of COVID
22 where you were seeing less of him, or was
23 it some other period of time?

24 A. It was probably during COVID.

25 Q. And we've heard a couple of

1 C. Bennett

2 times to a period of time when your
3 responsibilities changed.

4 When did that happen? When was
5 the first change in your responsibilities?

6 A. The first change in my
7 responsibilities took place on May 9,
8 2019. That's when I met the Governor and
9 was, as I see it, the first day as his
10 executive assistant.

11 Q. What happened in -- where did
12 you meet the Governor in May?

13 A. I met him in his office at 633.

14 Q. And how did it come about that
15 you met him in his office on that day?

16 A. I was asked to come upstairs to
17 see Annabel Walsh, my boss, and she had
18 the day prior told me we -- I don't
19 remember exactly what she had said the day
20 before, but said, you know, let's get a
21 meeting with him to see if this position
22 as executive assistant could work.

23 So I get a call on May 9. I go
24 to Annabel, and she asks me if I'm ready
25 to meet with him.

1 C. Bennett

2 Q. And prior to the conversation
3 where Annabel said we need to get a
4 meeting to see if this position would
5 work, had you talked with anyone before
6 that about the possibility of becoming
7 executive assistant to the Governor?

8 A. No.

9 Q. And did she tell you why you
10 were being considered for the position of
11 executive assistant to the Governor?

12 A. Not that I can remember.

13 Q. And at the time you met with the
14 Governor, who was his executive assistant
15 or assistants in the New York City office?

16 A. [REDACTED] Staffer #5 [REDACTED].

17 Q. Anyone else in New York?

18 A. No.

19 Q. And so you got the call from
20 Annabel saying you had a meeting with the
21 Governor?

22 A. I received a call that Annabel
23 wanted to speak with me, and then when I
24 arrived in her office, she asked if I was
25 ready to meet with him.

1 C. Bennett

2 Q. Where was Annabel Walsh's
3 office?

4 A. Connected to and directly next
5 to Stephanie Benton's.

6 Q. So did you tell Annabel Walsh
7 that you were ready to meet with the
8 Governor?

9 A. Yes.

10 Q. And did you then go meet with
11 the Governor?

12 A. Yes.

13 Q. Was that in his office?

14 A. Yes.

15 Q. And who was present?

16 A. Annabel Walsh and the Governor.

17 Q. How long did this meeting last?

18 A. I cannot recall specifically,
19 but it was -- no, I don't want to guess,
20 but it was brief.

21 Q. And do you recall anything of
22 what you said, the Governor said, or Ms.
23 Walsh said?

24 A. Annabel introduced me briefly,
25 and the rest of the conversation was

1 C. Bennett
2 mostly between the Governor and myself.
3 He asked me basic questions about what I
4 had done previously for work, where I was
5 from, how long I had been with the
6 administration, and in what capacity. It
7 was a very introductory meeting.

8 Q. And were you offered the
9 position during that meeting?

10 A. Nothing explicit.

11 Q. What was the next thing that
12 happened in connection with you becoming
13 an executive assistant to the Governor?

14 A. After that meeting, I started
15 sitting on thirty-nine, the thirty-ninth
16 floor.

17 Q. And who asked or directed you to
18 start sitting on the thirty-ninth floor?

19 A. I do not remember.

20 Q. And how long after the meeting
21 with the Governor did you start sitting on
22 the thirty-ninth floor?

23 A. I don't remember. It was maybe
24 that day or that week.

25 Q. And when you went up to the

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1 C. Bennett
2 thirty-ninth floor, is that the desk that
3 you were describing that was near outside
4 of Ms. Benton's office?

5 A. Correct.

6 Q. And prior to becoming the
7 executive assistant to the Governor, did
8 you speak to anyone, [REDACTED] Staffer #5 [REDACTED] or
9 anyone else about what this role would
10 entail or whether you should take on this
11 role?

12 A. Staffers were, when they found
13 out that I was most likely going to take
14 the job, would share their opinion. It
15 was in the office considered a pretty big
16 deal.

17 And at that time, when I was
18 sitting at that desk, I was still sharing
19 it with [REDACTED] Staffer #5 [REDACTED] as we call him, [REDACTED] Staffer #5 [REDACTED]
20 [REDACTED] but [REDACTED] Staffer #5 [REDACTED] is his nickname, and [REDACTED] Staffer #5 [REDACTED]
21 was very clear with me about the
22 expectations of the job, his experience in
23 the role, and advice for me.

24 Q. How long did you and [REDACTED] share
25 the desk?

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1 C. Bennett

2 A. He left the Executive Chamber in
3 May, so it was a brief period of time, but
4 I don't know exactly the time.

5 Q. And what sort of information or
6 advice did [REDACTED] Staffer #5 share with you?

7 A. He was desperate to get out of
8 his current role, and had been waiting to
9 receive a new job for an extended period
10 of time. He explained that it was one of
11 the harder jobs in the office. He
12 described the Governor as someone who is
13 very charismatic, but to never get too
14 comfortable with him because he tests
15 people, and not to -- to always have your
16 guard up even if things seemed friendly.
17 He described being yelled at, very tough
18 hours, difficult work environment, toxic
19 work dynamics, issues negotiating his
20 salary. He explained to me that my job
21 was to keep Stephanie Benton happy. And
22 we at times discussed the power dynamics
23 in the office between the Governor and
24 senior staff and how to navigate them.

25 Q. Any other topics you recall that

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1 C. Bennett

2 Staffer #5 hared with you while you were sharing
3 the desk?

4 A. We spoke about how to dress,
5 certain things he liked or didn't like,
6 even down to how he liked his coffee,
7 which he explained to me he spent a
8 significant amount of money buying for the
9 Governor, his own personal money, and that
10 I would be doing the same and that I
11 should not expect to be reimbursed.

12 He showed me how to complete
13 certain tasks: If they ask you to do X,
14 this is how you do it, and you better do
15 it this way.

16 Q. Anything else you recall on any
17 other topics?

18 A. A lot of pep talk, like he
19 really was a friend at that time and I was
20 extremely nervous. I was confident but
21 nervous and he really wanted someone to
22 take his job.

23 Q. Did you have the understanding
24 that he couldn't leave unless there was
25 somebody in place to take his job?

1 C. Bennett

2 A. Yes.

3 Q. And what did he tell you about
4 his difficulty leaving the position?

5 A. He explained that they had hired
6 a staffer to replace him and, upon hiring,
7 the Governor -- upon hiring her, something
8 did not work out, and so they just kept
9 him in his position, and then he continued
10 to wait.

11 He explained to me that he had
12 to fight tooth and nail to receive his
13 raises, I don't know plural, I don't know
14 if it's singular; he explained that. The
15 tactic that worked best for him was his I
16 guess last resort, which was to threaten
17 to hand in his two-week notice by the end
18 of the day if he didn't receive
19 confirmation that he was going to get his
20 raise, and that was the way in which he
21 got his raise.

22 Q. Did he tell you who he had these
23 discussions with about his raise?

24 A. I'm not sure.

25 Q. You said he talked about the

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1 C. Bennett

2 Governor testing people.

3 Did he give you any examples of
4 how the Governor did that?

5 A. I don't remember right now any
6 particular examples.

7 Q. You said he described being
8 yelled at.

9 Did he tell you how often he had
10 been yelled at by the Governor?

11 A. My understanding was that their
12 relationship was not in a great place, so
13 it was -- I don't know how frequent, but
14 it wasn't a healthy communication between
15 the two of them.

16 Q. Did ^{Staffer #5} [redacted] describe being yelled at
17 by anyone else on staff?

18 A. Not specifically.

19 Q. You said that the two of you
20 discussed the power dynamics between the
21 Governor and some of the senior staff.

22 What did the two of you discuss
23 about that?

24 A. An example would be his
25 relationship to Stephanie, which I think a

1 C. Bennett

2 lot of the office -- I don't think people
3 understood exactly how much she did with
4 and for him, and that when Stephanie
5 speaks, it may as well be the Governor
6 speaking.

7 Later on in my position, after
8 he had left, I would text him I think for
9 advice. My relationship with my boss,
10 Annabel, largely started falling apart and
11 he -- I trusted his read on the situation
12 in a way that I felt very isolated and not
13 a lot of people can understand sitting in
14 the seat that we sat in, so kind of
15 looking to him as, you know, a mentor and
16 a friend.

17 Q. And I noticed that there's
18 tissues over there, so feel free to get up
19 and grab one if you need one at any point,
20 or if you need to take a break.

21 You said you think a lot of
22 people in the office realized how much Ms.
23 Benton did with and for the Governor.

24 What did you mean by that?

25 A. There was one -- just as an

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example, I didn't even know who she was. I'm not sure if I had laid my eyes on her much in the first few months. She sent an e-mail, it was either an e-mail or a PIN to me saying, "don't drop," meaning whatever the briefing was, don't drop that. And I asked [REDACTED] at the time we were told to drop this and she just said that's the final word, like no questions asked was how she explained it, and that really confused me, because she is -- I don't know if I'm explaining this well. If you're just a junior staffer, you might not, you know, interact with her at all and she really is his right hand and people can mistake her as an assistant, and Staffer #5 was very clear that she was absolutely not an assistant, and not to underestimate or sidestep or question or anything of that nature with Stephanie.

22 Q. What did Staffer #5 tell you about her
23 role or -- other than to say not to
24 underestimate, did he give you any other
25 description of what her role was?

1 C. Bennett

2 A. I don't remember right now, but
3 if something pops up.

4 Q. Over time, as you began working
5 more closely with Ms. Benton, what did you
6 determine about a her role was with
7 respect to the Governor?

8 A. She managed his life. She would
9 speak to his siblings, coordinate with
10 staff, she would tell him when he forgot
11 to do something, would track his
12 movements. If she was not in the office
13 and you were covering for her, the
14 expectation was you were writing an actual
15 list of all the things that he did and you
16 would provide her that, so she knew
17 exactly what he was doing, where he was,
18 and all the work that he had.

19 I don't know if that's a solid
20 explanation, but I really -- the most
21 right hand I've ever -- I could describe.

22 Q. And you said that you were later
23 ^{Staffer #5}texting [REDACTED] when you were having issues in
24 your relationship with Ms. Walsh.

25 When did that breakdown start to

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1 C. Bennett

2 happen?

3 A. That breakdown between Annabel
4 and me started over the summer of 2019, I
5 would say around August, and continued to
6 decline.

7 Q. We'll come back to that, but
8 what advice, if any, did ^{Staffer #5} give you about
9 dealing with Ms. Walsh?

10 A. I don't remember the
11 particulars, but the general message I
12 remember receiving was that she feels
13 threatened by me and that I need to -- or
14 not even that I need to, I think the
15 message I received, whether it was
16 something he said explicitly or not I
17 don't remember, but I really tried to let
18 things go if I could and that if she
19 wanted to be mean, then that was her
20 prerogative.

21 Q. In discussing power dynamics
22 with ^{Staffer #5} did the two of you discuss
23 Melissa DeRosa?

24 A. I'm sure question did, because
25 it would be difficult to talk about senior

1 C. Bennett
2 staff without talking about Melissa. But
3 again, I don't remember particulars.

4 Q. You said one of the topics you
5 discussed with [REDACTED] ^{Staffer #5} early on was how to
6 dress.

7 What did he say to you with
8 respect to that?

9 A. He told me that the Governor
10 would look him up and down, ask him why he
11 was wearing the shoes he was wearing or
12 would make a comment if he wasn't happy.
13 I'm not sure if we discussed heels and
14 dresses, it's possible, but I don't
15 remember.

16 Q. You said there was also other
17 junior staffers you spoke with when you
18 were assuming the role.

19 Who else did you speak with
20 about taking on the executive assistant
21 role?

22 A. [REDACTED] [REDACTED], [REDACTED] [REDACTED],
23 [REDACTED] [REDACTED] -- that's definitely not
24 her last name -- [REDACTED] [REDACTED], [REDACTED]
25 [REDACTED], [REDACTED] [REDACTED]. I'm sure others.

1 C. Bennett

2 Q. What did ████ ██████████ tell you
3 or say to you when she found out that you
4 were assuming the role?

5 A. She -- I don't remember what
6 exactly she said, but she was angry, and
7 it did cause, from the moment I found out
8 I would be in this position to her
9 departure later that summer, to May to
10 July, it -- she was noticeably frustrated
11 with me, and I heard from other staffers
12 that she was talking about it behind my
13 back.

14 Q. And did she tell you what she
15 was saying?

16 A. Not specifically, but she seemed
17 overwhelmed with the briefing book, and we
18 were the only two briefers, and I for a
19 bit did really step away. I was still
20 helping but not nearly what a full-time
21 briefer would be doing, because I was
22 training for a second job. But I also
23 understood that she was overworked, she
24 was frustrated, and I think hurt that -- I
25 don't want to guess how she was feeling,

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1 C. Bennett

2 but she had not yet met the Governor and
3 she was almost two years into her job.

4 Q. What did [REDACTED] say to you
5 about the position?

6 A. He was giving me advice on being
7 a body person. He had served not the
8 Governor but a different politician in a
9 similar capacity, obviously every job is
10 different at that level, but I think he
11 understood more than some of the others
12 what my -- what this change meant for me.

13 Q. Do you recall any of the advice
14 that he gave you?

15 A. Not specifically.

16 Q. Do you recall in general terms
17 what he advised you?

18 A. I don't remember specifically.
19 He shared -- I don't remember, but shared
20 stories and seemed proud of me and excited
21 for me and he was kind of like you can do
22 this.

23 Q. And [REDACTED] or whatever
24 her last name is, what did she say to you
25 about the role?

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1 C. Bennett

2 A. I also don't recall, but I do
3 think that I -- she received a lot of the
4 -- so [REDACTED] [REDACTED] [REDACTED], and [REDACTED] all
5 shared an office, so I think that they
6 were closest to [REDACTED] when she was dealing
7 with my transition, so I remember asking
8 her at one point to explain to me what the
9 issues with [REDACTED] were. I don't remember
10 what she said, but her response made it
11 clear to me that [REDACTED] was angry.

12 Q. And what did [REDACTED] [REDACTED] say to
13 you?

14 A. I remember on one of my first
15 days, I believe [REDACTED] [REDACTED], maybe someone
16 else, showed up at my cubicle and they
17 looked like they had death all over their
18 face. I was anxious, but their anxiety
19 was like terrifying for me.

20 I don't remember specifically
21 what she had said, but [REDACTED] [REDACTED], and
22 [REDACTED] office it was a meeting place
23 for a lot of junior staffers, and she
24 spent a lot of time there, so I definitely
25 -- and she was a very -- she said been

1 C. Bennett
2 there for years, so I absolutely know we
3 talked about it, and I just remember
4 receiving that visit on one of my first
5 days when I was at my desk and just
6 thinking like what is everyone -- it looks
7 like I died or something. I don't know.
8 And I remember texting ^{Staffer #5} [REDACTED] about it and
9 being like what's wrong.

10 Q. Did [REDACTED] ever tell you
11 why she seemed anxious when you assumed
12 that role?

13 A. No, I just think that no one
14 wanted it and it was like a death
15 sentence.

16 Q. Who told you that nobody wanted
17 it?

18 A. I don't think anyone, it was
19 more the issue of seeing the fact that
20 they couldn't seem to fill the position.

21 Q. And when you say it was a death
22 sentence, what did you mean by that?

23 A. I would say that's my own term,
24 so I'm not attributing that to anyone.
25 That you in that role will receive a lot

1 C. Bennett

2 of some of the harder dynamics of the
3 office.

4 Something that I remember now
5 about my conversations with [REDACTED] Staffer #5 he
6 explained that there were several women
7 before him who had held the role only for
8 a brief period of months, like back to
9 back to back, to the point where the
10 troopers who the EA would interact with a
11 lot, a lot of coordinating movements and
12 information sharing, the troopers couldn't
13 keep track of the names of the women
14 changing jobs, so there was a joke -- I
15 don't know who -- about just as an
16 example, I don't know if it was [REDACTED], but
17 it was like [REDACTED] One, [REDACTED] Two, [REDACTED]
18 Three, they started numbering with the
19 same name the replacements, because there
20 was such turnover.

21 There was something else that
22 popped up, but I'm losing it. It might
23 come back to me.

24 Q. You said you also spoke to [REDACTED]
25 [REDACTED] ?

1 C. Bennett

2 A. Yes.

3 Q. And what did [REDACTED] [REDACTED]
4 say to you?

5 A. She was newer. I don't remember
6 when she started, at some point over the
7 summer of 2019, and one of her previous
8 jobs was working for an executive and, in
9 that role, she, you know, had things
10 thrown at her, stories like that. And so
11 similar to [REDACTED] [REDACTED] with his stories
12 about being a body person, I think we were
13 kind of sharing war stories.

14 Q. And did you have any war stories
15 to tell at that point about the Governor
16 when she was sharing her war stories about
17 being an executive assistant for somebody
18 else?

19 A. I don't -- I'm not sure.

20 Q. What did [REDACTED] [REDACTED] tell you?

21 A. So I remember we were -- for
22 context, if the Governor didn't like you,
23 if you messed something up, that could
24 easily be the very last moment of your
25 job, and I remember he was leaving to work

1 C. Bennett

2 on a campaign, not related, he was just

3 leaving the administration, he was very

4 well-respected, very close to the

5 Governor, and I remember just saying like

6 I feel like I'm just going to mess up and

7 lose my job. It was late, we were at a

8 bar, and I was kind of like -- people

9 congratulating me, it was kind of the

10 talk, the chatter, so this list is more

11 just like the chatter of my experience

12 sharing it with other junior staffers.

13 And at the time when I said that [REDACTED], he

14 just was like isn't that like any other

15 job. And I was like yeah, that's a good

16 point. When you put it like that, yeah.

17 And then he came back for COVID,
18 we kind of rehired him for COVID, and we
19 had only overlapped briefly in 2019, so I
20 was like it's great to see you. We were
21 talking, he was back in the office, and I
22 relayed this story. I was like, I don't
23 know if you remember last year at the very
24 beginning of my job I made this comment of
25 I think I'm going to mess up and lose my

1 C. Bennett

2 job and you were like, well, isn't that
3 any job. And he was like, I'm sorry I
4 said that.

5 That was -- it was just kind of
6 funny because in that moment acknowledging
7 like no, it's not just any job, and so
8 belittle that anxiety is incorrect
9 because, in fact, I could give him the
10 wrong pen and he could decide that he
11 didn't like me anymore.

12 Q. Had you heard stories about
13 someone that did something really trivial
14 that put them out of their job?

15 A. No, but I understood that he
16 would have kind of an introductory meeting
17 with a potential replacement fo [REDACTED]^{Staffer #5} and he
18 would decide kind of on the spot I do or
19 do not want this person, which is I think
20 how [REDACTED]^{Staffer #5} got stuck in that position for so
21 long.

22 Q. And did any junior staffers tell
23 you that they think the Governor liked you
24 because you were pretty?

25 A. I received that, but I don't

1 C. Bennett

2 particularly know who from, but it really
3 bothered me. I only remember it because I
4 was offended, and I think at one point it
5 may have come from [REDACTED] and I felt like
6 some of her anger was also -- you know,
7 she had been in this job for two years,
8 blood, sweat, and tears, hadn't even met
9 him, and I get hired and within a few
10 months I'm moving floors, have multiple
11 job titles, I'm running the team that she
12 was just on for two years. And within
13 that, I don't know if she said it or if
14 someone else said it, but it was
15 definitely a theme that I took offense to.

16 Q. You mentioned that you
17 interacted with the troopers a lot,
18 coordinating the Governor's whereabouts
19 and such.

20 Did any troopers ever tell you
21 about any issues they had with the
22 Governor?

23 A. Not particular issues. I think
24 they were wondering to see how long I
25 would last in the position. I don't

1 C. Bennett
2 remember explicitly, but there may have --
3 and I could be wrong, but I am under the
4 impression that there was a bet to see how
5 long I would last.

6 Q. Do you recall what the range was
7 for the bets?

8 A. I exceeded it. That's what I
9 heard.

10 Q. When you became executive
11 assistant, did you continue to work as a
12 briefer? I know you said you stepped away
13 from it while you were learning the ropes,
14 but did you continue working on the
15 briefing team in any capacity?

16 A. Yes.

17 Q. And what did you do on the
18 briefing team after you assumed the
19 executive assistant responsibilities?

20 A. Can you repeat that question?

21 Q. Sure.

22 Once you took on some
23 responsibilities as executive assistant,
24 what did you continue to do with respect
25 to the briefing role?

1 C. Bennett

2 A. I would help [REDACTED]. Usually she
3 would take the lead and I would kind of
4 take orders from her. It largely depended
5 on the day. Days where I was staffing the
6 Governor, usually less responsive and less
7 available.

8 Q. And did there come a time where
9 your role on the briefing team changed at
10 all?

11 A. Yes.

12 Q. When was that?

13 A. That was when [REDACTED] left.

14 Q. And you said that was around
15 July of 2019?

16 A. Correct.

17 Q. And after she left, how did your
18 role change?

19 A. I became senior briefer.

20 Q. And was someone -- was anyone
21 else hired on the New York team to be a
22 briefer at that time?

23 A. Yes.

24 Q. And who was hired then?

25 A. [REDACTED] [REDACTED].

1 C. Bennett

2 Q. So after May of 2019, describe
3 sort of what your day-to-day roles were.

4 A. I was serving as an executive
5 assistant and then, in the time and
6 capacity I had left over, I was helping
7 ██████████ with the briefing book and she was
8 trying her best to prepare me for her
9 departure.

10 Q. And during the summer of 2019,
11 did you do any traveling with the
12 Governor?

13 A. Yes.

14 Q. How often did you travel with
15 the Governor during the summer of 2019?

16 A. A handful of times. My first
17 travel with him was the day of the Pride
18 parade in 2019, and that went really well,
19 according to Stephanie after the fact, and
20 so I traveled with him several more times
21 through the summer.

22 Q. And I meant to ask, so after May
23 of 2019, did you continue to report to
24 Annabel Walsh for the briefing work that
25 you did?

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2 A. Yes.

3 Q. And who did you report to for
4 the executive assistant role?

5 A. Stephanie Benton and Annabel in
6 some capacity.

7 Q. And during the trips you took
8 with the Governor in the summer of 2019,
9 did anything inappropriate happen?

10 A. No.

11 Q. And did there come a time where
12 you stopped doing the traveling with the
13 Governor?

14 A. In August of 2019.

15 Q. And what led to you no longer
16 traveling with the Governor in August of
17 2019?

18 A. I was overworked and said as
19 much to Jill Desrosiers and Annabel Walsh,
20 and I explained, prior to the end of my
21 travel, that I was concerned something was
22 going to fall through the cracks. I said
23 I was concerned that I was juggling some
24 pretty important responsibilities and I
25 wanted to raise my concern with them

1 C. Bennett
2 before something happened that it's very
3 possible something may happen in which I
4 am simply at capacity and it doesn't go
5 well for that reason, and that is largely
6 what happened. And I got yelled at on the
7 phone by Stephanie Benton, Annabel Walsh,
8 and Jill Desrosiers.

9 Following that phone call, I
10 called Annabel and just, you know, I took
11 responsibility for the issue at hand, but
12 explained that there's simply no way I can
13 be an at-my-desk executive assistant, be a
14 senior briefer to a very new team of two
15 right out of college staffers, and also
16 travel with the Governor, and that I was
17 going to stop traveling.

18 Q. You mentioned two just out of
19 college briefers. You mentioned [REDACTED].

20 Who was the another new briefer?

21 A. [REDACTED] [REDACTED] was based in
22 Albany.

23 Q. And do you recall the incident
24 was that had you getting yelled at by
25 Stephanie Benton, Annabel Walsh, and Jill

1 C. Bennett

2 Desrosiers?

3 A. I at that time had worked out of
4 the Executive Mansion, and there was a
5 weekend when the capital was simply shut
6 down, and I gave [REDACTED] permission to go
7 to the Executive Mansion to print the book
8 materials, because the capital was shut
9 down and I think I misread my -- I felt
10 comfortable working out of the Executive
11 Mansion, and I gave her permission to go
12 there on the weekend to use the back
13 office, and he saw her and mentioned it to
14 Stephanie, who then asked why there was a
15 staffer at the Executive Mansion, and I
16 took responsibility and I said the entire
17 office was closed, so I told her to use
18 the printer at the mansion. And that was
19 my mistake.

20 Q. You say he saw her.

21 Was that the Governor who saw
22 her at the mansion?

23 A. Correct.

24 Q. And you said you told Annabel
25 Walsh that you weren't going to travel

1 C. Bennett

2 with the Governor anymore.

3 How did she respond?

4 A. She seemed to accept it.

5 Q. Was she at all upset when you
6 told her?

7 A. She asked me leading questions
8 and wanted to see if I would complain
9 about being yelled at on the phone by
10 three senior staff and asked me if I felt
11 attacked or if I felt sabotaged or very --
12 felt unprofessional and inappropriate
13 questions and I said, no, I take
14 responsibility for my mistake, but like I
15 said, I'm working three jobs, those are
16 three jobs, and I'm not going to do that;
17 I told you I couldn't. I told Jill I
18 wouldn't that this was going to be an
19 issue. It's an issue, so I'm not going to
20 travel now.

21 Q. I'm going to ask you to turn to
22 the binder in front of you and look at the
23 first tab. And let me just explain that
24 we got some texts from Staffer #5 that had some
25 technical issue, so they had to be put

1 C. Bennett
2 into a spreadsheet so we could see when
3 the dates they were actually sent. Let me
4 get my glasses on, because this type is
5 teeny.

6 And here these are texts between
7 you and [REDACTED] ^{Staffer #5} August 9, 2019, and you wrote,
8 "also, just got Annabel on the phone and
9 put my foot down. On Wednesday, told her
10 they were being ridiculous and I would
11 stop doing the other jobs if they didn't
12 take a step back and realize. Told her
13 I'm not going to Alb anymore and not
14 flying with him anymore."

15 Is that when you had that
16 conversation with Ms. Walsh and you said
17 you weren't going to travel anymore?

18 A. Yes.

19 Q. And little further down, it
20 looks like [REDACTED] ^{Staffer #5} asked you, "how did that
21 go," and you wrote, in all caps, "pissed."

22 Do you recall what you're
23 referring to there?

24 A. I was very angry.

25 Q. So you were referring to you

1 C. Bennett

2 were angry, not Ms. Walsh was angry?

3 A. I was angry.

4 Q. You can put that aside.

5 When you first started working
6 for the administration, what was your
7 salary?

8 A. ██████████, I believe.

9 Q. And --

10 A. Around there.

11 Sorry.

12 Q. That's okay.

13 Did you have any sense what
14 other junior staffers got paid?

15 A. I know ██████████ had a
16 similar salary to my own.

17 Q. Did there come a time where you
18 talked to anyone about getting a raise?

19 A. Yes.

20 Q. And when was that?

21 A. I was starting conversations
22 probably September of 2019 through
23 October, 2019 with the expectation of
24 continuing those conversations in 2020.

25 Q. Who did you start having the

1 C. Bennett

2 conversations with?

3 A. Staffer #5. I know I spoke
4 with [REDACTED]. I spoke with -- I think
5 those were the two main people I spoke
6 with, but I was very vocally upset about
7 my salary at that time.

8 Q. You described before your
9 conversations with [REDACTED].

10 What did you and [REDACTED] discuss
11 about your salary, or about getting a
12 raise?

13 A. How to go about asking for a
14 raise and what I saw as a painful process
15 to secure that raise.

16 Q. And what is the painful process
17 that you saw from getting a raise?

18 A. I -- and as you can see in the
19 conversation we just looked at, I was
20 feeling very taken advantage of. I
21 started working for the administration and
22 then I was working two completely separate
23 roles, two full-time jobs held by two
24 separate people, and I still had an
25 entry-level salary, and I was commuting

1 C. Bennett

2 three hours a day to get into the city
3 because I couldn't afford to move, even
4 though I held significant responsibility
5 and multiple titles. And I thought it was
6 -- I saw it as a huge problem.

7 Q. Did [REDACTED] [REDACTED] give you any
8 advice as to how to go about asking for a
9 raise?

10 A. I don't remember.

11 Q. When, if ever, did you first
12 discuss getting a raise with anyone that
13 had the leeway to give you a raise?

14 A. I spoke with Annabel Walsh. I
15 believe that conversation started in
16 September is my best guess.

17 Q. And what did you say to Ms.
18 Walsh and what did she say to you?

19 A. I explained that, with the hours
20 I was working, if I were paid hourly,
21 broke it down by the hour, I would be paid
22 less than minimum wage for the State of
23 New York. I have multiple
24 responsibilities, one of which is leading
25 a team. I can't afford to live in the

1 C. Bennett

2 city in which I work.

3 And I was almost emotional to
4 the point of being so at capacity, so
5 exhausted, and under so much stress and
6 pressure, and was really -- explained to
7 her that I saw -- I thought it would be
8 more appropriate to fully renegotiate my
9 sale, because I was in two positions that
10 I did not have when I first started with
11 the administration, even though my
12 paycheck had not changed.

13 Q. And what was her response?

14 A. I remember her joking that she
15 also couldn't afford to live in this very
16 expensive city, which was very painful for
17 me at the time. I didn't think it was
18 funny. I actually saw it as extremely
19 unprofessional and diminishing of actually
20 very valid points that I had. She also
21 suggested that I travel more. I believe
22 in the same conversation I was trying to
23 raise the issue of expanding the briefing
24 team, because we only had one Albany
25 staffer, and that I simply was not going

1 C. Bennett
2 to travel to Albany to cover us because we
3 were understaffed, because I was running
4 the team and also had to be at my desk in
5 New York City when he -- when the Governor
6 was in town, and she disagreed with that
7 as well.

8 I think I asked for a specific
9 number. She didn't seem to take that
10 seriously but said that we could work out
11 something. It was, as I remember it, I
12 was pretty emotional and I was very
13 frustrated and I didn't -- as productive
14 as I was because the series of
15 conversations we engaged in did result in
16 a raise, I was extremely disheartened by
17 her professionalism and her dismissive
18 attitude.

19 Q. And in fall of 2019, how many
20 conversations did you have with Ms. Walsh
21 about getting a raise?

22 A. At least two.

23 Q. And you said you ultimately
24 worked out a raise; is that correct?

25 A. Correct.

1 C. Bennett

2 Q. When did you get the raise?

3 A. October.

4 Q. And what was the raise to?

5 A. Fifty-five.

6 Q. If you could turn to tab two.

7 It's another text exchange that is in this
8 format because of the technical issues

9 between you and [REDACTED] Staffer #5. And this
10 exchange is on September 23, 2019 and you
11 wrote in part, "I asked Annabel if we
12 could talk about a raise and she gave me a
13 fine/acceptable but also typical Annabel
14 shitty response." You say "respond" and
15 then "response."

16 Do you recall what the "Annabel
17 shitty response" was you were referring
18 to?

19 A. I think the fine/acceptable is
20 me stating that yes, I would get a raise,
21 and in that capacity it was a
22 fine/acceptable meeting, but with that
23 came I think some of the same behavior I
24 stated in terms of being, in my mind,
25 unprofessional and dismissive.

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2 Q. And this is dated September 23,
3 2019.

4 Was that the date of your first
5 conversation with Ms. Walsh, or your
6 second one?

7 A. This was the first conversation.

8 Q. And further down Staffer #5 wrote, "I
9 got my first raise after three years by
10 threatening to quit on the spot."

11 That's the conversation or
12 exchange you referred to earlier? You
13 have to say yes or no out loud.

14 A. Sorry, yes.

15 Q. And if you look on the flip side
16 of this page, it was in that first
17 conversation with Ms. Walsh where she told
18 you that she couldn't afford to live in
19 the city?

20 A. Yes.

21 Q. Did she, in fact, live in the
22 city?

23 A. Yes.

24 Q. And what was your reaction when
25 she said she couldn't afford to live in

1 C. Bennett

2 the city?

3 A. I don't believe I gave it any
4 response in the moment.

5 Q. You talked earlier about your
6 relationship with Ms. Walsh having issues.

7 In the fall of 2019, do you
8 recall what, if any, issues you were
9 having with Ms. Walsh?

10 A. There seemed to be issues. I
11 interpret it largely as being successful
12 in my positions, my growing relationship
13 with the Governor, and my vocal
14 frustration when necessary.

15 Q. Do you recall any particular
16 events or issues where you and Ms. Walsh
17 had a disagreement?

18 A. Yes.

19 Q. What do you recall?

20 A. In December of 2019, I raised
21 the issue of again we need more staff on
22 this team. And she in turn asked me like
23 what I did in the office, and I explained
24 that I had two jobs, there's one person in
25 Albany, we're all burnt out: [REDACTED] is

1 C. Bennett
2 burnt out, I'm burnt out, [REDACTED] burnt
3 out. I tried to raise the issue of having
4 not enough staff, and also being split
5 between two jobs. And she asked me what I
6 did every day, explained that perhaps I
7 didn't have two jobs because all I do is
8 sit and the Governor's never actually in
9 New York City, so that wasn't a job. And
10 the other job, which was being senior
11 briefer, was just me waiting for the
12 speeches to be done and copying and
13 pasting words. That was probably my most
14 memorable argument with her.

15 Q. What did you say to her when she
16 said you really didn't do anything?

17 A. I don't remember off the top of
18 my head, but -- I don't remember right
19 now. But the meeting as a whole was
20 pretty emotional for me and I was angry
21 and sad. I remember like I don't know if
22 it was this conversation or another one, I
23 asked to take off for Christmas and she
24 said no, and I just remember a period of
25 time in December in which I was so angry

1 C. Bennett
2 and so hurt and at my wit's end and like
3 kind of reaching out for help because I
4 was almost about to go up and quit. I was
5 at that point where I was like really
6 reaching my ceiling.

7 MS. CLARK: Do you want to take a
8 break? I think we might actually need
9 to take a break soon for changing the
10 media units they're using, so why
11 don't we take us off the record and
12 we'll take a short break.

13 THE VIDEOGRAPHER: Is that okay
14 to go off the record?

15 The time is 11:50. We're going
16 off the record.

17 (Whereupon a break was taken)

18 THE VIDEOGRAPHER: The time is
19 approximately 12:07 p.m.

20 We're back on the record.

21 Q. Okay.

22 This morning you mentioned that

23 Staffer #5 told you that he bought coffee for
24 the Governor and you would have to do the
25 same.

1 C. Bennett

2 When you became executive
3 assistant, did you start buying the
4 Governor coffee?

5 A. Yes.

6 Q. And did anyone other than Staffer #5
7 tell you that this is something that was
8 expected of you?

9 A. I don't know if it was ever
10 explicitly said; it just began. And Staffer #5
11 was my tutorial in many ways.

12 I will say that, at Staffer #5's going
13 away party, they presented him with a
14 Dunkin' Donuts gift card or some gift that
15 was kind of like a joke about the fact
16 that he spent thousands of dollars on
17 coffee.

18 Q. He told you he spent thousands
19 on coffee?

20 A. Yes.

21 Q. Who gave him the Dunkin' Donuts
22 gift card as the going away present?

23 A. I believe Jill Desrosiers
24 presented it at the party.

25 Q. And if you could turn to the

1 C. Bennett
2 binder referring to tab four, and these
3 are some documents that you provided to
4 us.

5 What are these?

6 A. These are receipts for coffee
7 for the Governor.

8 Q. And are these receipts that you
9 paid for out of your pocket?

10 A. Yes.

11 Q. And are these the receipts for
12 every time you bought the Governor coffee,
13 or just some portion of it?

14 A. Some portion.

15 Q. And why did you save these
16 receipts?

17 A. I was angry and thought it was
18 wrong, and also just wanted a record of
19 how much money I was spending on this
20 endeavor, in the same vein of I was
21 underpaid, I was also -- I just said.

22 Thought it was outstanding that
23 I was making entry-level salary -- I had
24 an entry-level salary and I was spending
25 money for the Governor of New York.

1 C. Bennett

2 Q. Did you ever tally how much you
3 spent buying coffee for the Governor?

4 A. No, I did not.

5 Q. You said this is only a portion.

6 Is there a reason why you saved
7 some receipts but not others?

8 A. Usually I was not the person to
9 get the coffee, so when the coffee came
10 back, I would just like throw the receipt
11 in my desk drawer. So it was a mix of
12 sometimes I just tossed the receipt out
13 and didn't have it. Other times I had it,
14 put it in there. But I didn't really have
15 necessarily a system. It was more just
16 like almost a ritual of self-respect.

17 Q. Who went out to get the coffee,
18 typically?

19 A. There were -- well, anyone. If
20 there were three people in the office, I'd
21 be like you, you've got to go get the
22 Governor coffee, here's my card. But
23 traditionally it was the drivers, like the
24 office -- I don't know what their title
25 would be. They drove the state vehicles,

1 C. Bennett

2 they supplied the office, their offices
3 were in kind of like the supply room. I
4 don't know what their title is.

5 Q. But you'd then give them your
6 bank card to buy the coffee?

7 A. Yes.

8 Q. Did you ever speak to Stephanie
9 Benton or Jill Desrosiers or anybody else
10 in a senior position about getting
11 reimbursed for the coffee?

12 A. No.

13 Q. You mentioned that it was Jill
14 Desrosiers that gave ^{Staffer #5} [REDACTED] the -- you think
15 the Dunkin' Donuts card.

16 Were Stephanie Benton and Jill
17 Desrosiers aware that you were buying
18 coffee out of your own pocket?

19 A. Yes. There were times when like
20 a few times but sometimes Stephanie would
21 give me cash instead or use her card
22 instead. She would also get coffee
23 sometimes, so it would -- on occasion she
24 would say here's some money or here's my
25 card, can you also get me something.

1 C. Bennett

2 Q. Did you ever mention it to the
3 Governor?

4 A. No.

5 Q. Were you required to buy
6 anything else using your own money?

7 A. Not that I can remember that I
8 wasn't reimbursed for.

9 Q. So when you became an executive
10 assistant, you said that Annabel Walsh
11 said that the Governor wasn't in New York
12 City very often.

13 How often was he coming into New
14 York City when you first became executive
15 assistant?

16 A. I would on average say he was in
17 the city half the week.

18 Q. And did that change at any time,
19 the frequency?

20 A. He was around much more in the
21 fall.

22 Q. How often was he spending in the
23 fall in the New York City office?

24 A. It was sporadic, so it's really
25 difficult to pin down. But I would still

1 C. Bennett
2 say on average half the week or sometimes
3 you wouldn't see him for a few days and
4 then you'd see him four days in a row.

5 Q. Can you describe for us what the
6 culture was like in the Executive Chamber?

7 A. It was extremely toxic,
8 extremely abusive. If you got yelled at
9 in front of everyone, it wasn't any
10 special day. Things needed to happen
11 immediately, and there was no excuse as to
12 why it couldn't, even if it was just like
13 outside of the realm of physics entirely.
14 It was controlled largely by his temper,
15 and he was surrounded by people who
16 enabled his behavior, like surrounded by
17 yes men -- I'll use that term -- of this
18 is what he wants, this is what he gets,
19 and that mood and that anger or that fear
20 of him suddenly becoming angry definitely
21 ruled the office and then trickled down,
22 which is why it was like more stressful
23 where I sat. But like the stress kind of
24 seeped out through the thirty-ninth floor
25 and then it was still stressful on

1 C. Bennett
2 thirty-eight but not as much. It was felt
3 very like every man/woman for themselves,
4 don't trust anyone is the advice I got,
5 just be very wary of your friends. It was
6 like go cry to your mom kind of attitude
7 about having a bad day.

8 There were several occasions on
9 which I saw Jill Desrosiers in tears in
10 his office. He wouldn't -- he really --
11 it was hard for me to hear him yelling at
12 people, and I wasn't even in the room, and
13 it impacted like my emotional state from
14 my cubicle outside his office, and it
15 could be anyone.

16 Q. Who did you hear him yelling at?

17 A. It could be anybody.

18 Q. You said you saw Jill Desrosiers
19 crying.

20 Anyone else that you saw that
21 was upset after an interaction with the
22 Governor?

23 A. I -- so part of my job was
24 collecting people for meetings. So he
25 would say -- Stephanie would say we need

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these five people either as soon as possible in five minutes, so once he gets off the phone they can enter the room, so I was kind of like the wrangler or my position was the wrangler, and you would see senior staff standing at my cubicle like talking to each other in very obvious distress. Like okay, we're going to go in there, here's the plan or kind of scheming with each other to make sure they have the right answers and they're all on the same page, visibly stressed, very much dreading the interaction. And Annabel would do this thing sometimes where she would convene everyone or I had convened people and we were still waiting to get the green light to like shepherd everyone in, and she would collect people into her office and like okay, do these like scheming sessions and Stephanie would like kind of burst through her office and be like, everyone out and correct the behavior, which Annabel knew she wasn't supposed to do, which was basically like, you know,

1 C. Bennett

2 let's get our stories straight, and to the
3 point where it was like actually difficult
4 to drag some people into the office, and
5 you could see the stress on their face.

6 Q. Anyone else you saw crying?

7 A. Yeah, I feel like I cried at
8 times, I know other junior staffers cried.
9 It doesn't -- I don't know if I have like
10 a particular example, because it also
11 wasn't very outstanding.

12 Q. You described a little earlier a
13 time in August, 2019 where Annabel Walsh,
14 Stephanie Benton, and Jill Desrosiers were
15 all yelling at you.

16 Were there any other occasions
17 where anyone on the senior staff yelled at
18 you?

19 A. Yes.

20 Q. How many times?

21 A. A number will be difficult. It
22 wasn't unusual. It wasn't out of the
23 ordinary. I don't know if I can put a
24 number to it.

25 Q. Who were the senior staffers who

1 C. Bennett

2 yelled at you at different points in time?

3 A. Jill Desrosiers, Annabel Walsh,
4 Melissa DeRosa, Stephanie Benton, Dani
5 Lever?

6 Q. Were any of them worse than
7 others in terms of their treatment of you?

8 A. Melissa DeRosa is one of the
9 meanest people I've met in my whole life.

10 Q. And can you describe what leads
11 you to that description?

12 A. You can hear her screaming no
13 matter where you're sitting on the
14 thirty-ninth floor. She could be on a
15 phone call and you will know, and you
16 could be on the other side of the floor.

17 And in a lot of ways I
18 considered myself lucky because, even
19 though I got screamed at, I also saw a lot
20 of things that I didn't have to be a part
21 of and that was almost more -- I don't
22 know, I just -- there was an instance in
23 which the Governor was on a radio show
24 real-time on the phone and Dani Lever is
25 supposed to be advising him, she's

1 C. Bennett
2 director of communications, so she's
3 sitting in Stephanie Benton's seat. And I
4 start getting calls from Melissa, who's
5 listening to the radio from her office,
6 and is telling me to get Dani on the
7 phone, because she's trying to correct
8 things that he's saying in real-time.

9 So I'm trying to dial
10 Stephanie's desk and it's not -- like I
11 tried multiple times, it's not going
12 through. She comes down there at the end
13 of the radio show and screams at me. And
14 I look inside and Dani had taken the phone
15 off of the receiver because she didn't
16 want someone calling in the middle of a
17 radio show. So there was literally no way
18 that I could have, one, relayed that
19 message at all because it was real-time
20 radio or two, gotten through to Dani,
21 because she took the phone off the hook,
22 and I just got reamed out, and that was
23 just -- you know, Stephanie walked by
24 after and like kind of laughed, like she
25 knew what Dani had done and didn't say

1 C. Bennett

2 anything, but she kind of laughed it off.
3 And that was just Melissa telling me what
4 to do, and that was nothing out of the
5 ordinary.

6 Q. Did anyone tell you that she
7 left working for the Executive Chamber
8 because of getting yelled at by any of
9 these -- or treatment by these senior
10 staffers?

11 A. I think most people left because
12 of the environment. I don't know if they
13 would say explicitly I was yelled at by
14 senior staff so I quit, but I think the
15 briefer who was hired the same day I was
16 in January, 2019 lasted a week and she
17 said it was because her anxiety was -- she
18 just couldn't handle it. So it was high
19 turnover, but I also don't want to speak
20 to one particular person's reasons for
21 leaving.

22 Q. Did ^{Staffer #5} ever tell you why he
23 was so eager to leave?

24 A. I think he had a horrible
25 relationship with the Governor and had

1 C. Bennett

2 endured enough abuse.

3 One of the jokes that was before
4 my time in that seat, but the escape
5 button on the keyboard at my desk, [REDACTED] Staffer #5's
6 desk had been whited out because there's
7 no escape, and that was like a running
8 joke of like people actively like trying
9 to leave and not being able to.

10 You know, one staffer -- yeah, I
11 don't want to speak to particular people's
12 experiences, but it was extremely brutal.

13 I remember one Saturday morning
14 I didn't wake up early enough, and there
15 was nothing going on for the day, but I
16 didn't wake up early enough and I had
17 received an e-mail from Melissa early in
18 the morning, maybe 6:30, that I hadn't
19 seen until later in the day, and later as
20 in like maybe 7:30, and she didn't even
21 seem mad, she didn't even reply with
22 anything mean, but I literally was like
23 crying to my parents for like at least an
24 hour because I didn't see her e-mail
25 immediately. Like she didn't even need to

1 C. Bennett
2 say you were late on this, it was simply
3 like I'm -- it's like living in fear and
4 anxiety and at any moment looking at your
5 phone and, you know, seeing the meanest
6 messages, all caps, you know, profanities.

7 Q. And when you talk about all caps
8 and profanities, would that be from
9 Melissa DeRosa or other people as well?

10 A. Other people as well, and I was
11 told I had to do the same in order to like
12 not get in trouble for something not
13 happening on a certain timeline. I also
14 had to exude that same kind of
15 personality.

16 Q. Who told you you had to exude
17 that same personality?

18 A. Annabel Walsh.

19 Q. And did you do what she told you
20 to and tried to behave in the way you saw
21 the senior staffers behave?

22 A. I tried to be nice about it, but
23 I definitely like I would set fire under
24 someone's ass if I needed to, absolutely.

25 Q. And how would you go about doing

1 C. Bennett

2 that?

3 A. An example of the Governor wants
4 to speak with someone and I'm trying to
5 get ahold of them, I called their desk
6 phone, I call their personal phone, I text
7 their personal phone, I call and text
8 their work phone, I send them multiple
9 e-mails where in the subject Gov now.
10 It's like harassing them until you get in
11 contact with them and then telling them
12 you need to be here yesterday, like get to
13 my desk, and just really making a deadline
14 extremely clear.

15 Q. Did you ever yell at anybody?

16 A. Yes.

17 Q. How many times did you yell at
18 somebody?

19 A. I don't remember. I really
20 tried not to. But there were absolutely
21 times in which, particularly in moments
22 where I was getting screamed at, that I
23 would turn around and say like what the
24 fuck, guys, or just -- you know, it was --
25 again, I just didn't feel like it was --

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2 didn't feel good, but it was also exactly
3 what everyone was doing.

4 Q. Did anyone ever talk to you
5 about being upset about you yelling at
6 them?

7 A. I yelled at [REDACTED] [REDACTED], and I
8 still think about it, actually, because I
9 really -- yeah, I was mad and I was really
10 tired and I addressed it over the summer,
11 actually. I was just like I'm sorry, that
12 was really harsh.

13 Yeah, it felt like it was the
14 only way to -- it's like what you're told
15 to do and it also feels at the time the
16 only way for people to take seriously that
17 like -- like I'm going to get my ass
18 handed to me if you don't do your job, so
19 you need to understand the heat that I'm
20 getting, so like I also am going to give
21 you some of that heat and I really tried
22 not to, but there are absolutely times
23 that I yelled at my team.

24 Q. If you could turn to tab seven
25 in the binder in front of you.

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2 This is another text exchange
3 between you and [REDACTED] where he wrote, "that
4 was a big reason I wanted to leave," and
5 it looks like you wrote back, "Annabel or
6 just generally all the bullshit and shitty
7 people." And he wrote, "Annabel pissed me
8 off," and then in call caps, "a lot, and
9 so did other people. LOL."

10 Did he ever tell you about any
11 experiences he had with Ms. Walsh?

12 A. He had similar issues with her,
13 but their dynamic was very different,
14 because she was my direct boss in my other
15 role. In his experiences, I think he
16 pushed back more with her. But she was
17 definitely very manipulative, very -- I
18 don't even know how to describe Annabel.
19 Because one day she could be really nice
20 and then the next day she could throw you
21 straight under the bus.

22 I mean, there was at least one
23 occasion off the top of my head I can
24 remember her actively trying to blame me
25 for a mistake that she herself made,

1 C. Bennett

2 which, I mean, I wouldn't do that to my
3 own team. And I just had a lot of
4 problems with her again professionalism,
5 leadership, and behavior.

6 She would throw someone straight
7 under the bus to secure her own position,
8 look good in any way, save face.

9 Q. And you mentioned the occasion
10 where the three senior staffers yelled at
11 you.

12 Did Stephanie Benton yell a lot?

13 A. Stephanie doesn't -- well,
14 Stephanie of course yells, but she more so
15 speaks quietly and meanly where her
16 yelling at you may just be normal volume
17 and just like tear you down from the
18 inside out, but she wouldn't raise her
19 voice one bit.

20 Q. What sort of things would she
21 say that would be mean that would have
22 sort of the impact that you just
23 described?

24 A. I can't think of an example off
25 the top of my head.

1 C. Bennett

2 Q. Did you ever hear anyone in the
3 office use the term "mean girls?"

4 A. Yes.

5 Q. And who did you understand that
6 referred to?

7 A. Stephanie, Annabel, Dani,
8 Melissa. I was never quite sure where
9 Jill fit into that. I think Jill was a
10 part of that group, but I wouldn't -- I in
11 some ways would almost -- I guess she was
12 a part of it.

13 Q. And who did you hear using the
14 term "mean girls" to refer to that group
15 of women?

16 A. I couldn't tell you. I don't
17 know where it came from.

18 Q. Did you ever use the term to
19 refer to them?

20 A. It's very possible. It's very
21 possible.

22 Q. Did you ever hear the Governor
23 use the term "mean girls" to refer to
24 them?

25 A. No, but he was very aware of the

1 C. Bennett

2 behavior happening.

3 Q. What's your basis for saying
4 that?

5 A. It felt as if in some ways he,
6 rather than yelling at people, part of his
7 game -- referring back to what I said
8 before -- like his test is setting up
9 someone in a position where they're being
10 abused by the people around him and not
11 just directly from him. He is aware that
12 they are mean and maybe will even rile
13 them up and say or do something or like
14 throw a slight into a conversation that
15 rocks the boat and then can kind of watch
16 from the sides as they kind of take the
17 lead on being the meaner ones.

18 I mean, there was -- I don't
19 know who told me, but I was told that he
20 enjoyed Melissa keeping her door open so
21 he could hear her screaming at people from
22 her office during the workday.

23 Q. Who told you that?

24 A. I don't know.

25 Q. Did anyone ever tell you that

1 C. Bennett

2 the Governor and Senior Staffer #1 ██████ had more
3 than a professional relationship, any sort
4 of romantic or sexual relationship?

5 A. I questioned it. Other people
6 who potentially I feel like there's always
7 kind of the like you get happy hour with
8 your co-workers and there's speculation.
9 Again, I don't have specific names of like
10 this person thought that they had slept
11 together, but my -- I was really confused
12 by his relationship with Senior Staffer #1,
13 Senior Staffer #2, and Senior Staffer #3 in particular.

14 And continuing to answer your
15 other question about the mean girls, you
16 know, at one point early in my time as
17 executive assistant, he called me in and
18 then called Stephanie in and addressed his
19 relationship with Stephanie to me while
20 she was sitting next to me. And it felt
21 very clear that he was establishing
22 certain dynamics and it was a little bit
23 bizarre, just the we've been together for
24 X number of years, which is him referring
25 to the fact that she had worked for him

1 C. Bennett

2 for a very long time.

3 I just always suspected that he
4 probably [REDACTED] with [REDACTED] [REDACTED] [REDACTED],
5 but I never had any concrete evidence of
6 that.

7 Q. And the three were Senior Staffer #1

8 [REDACTED], Senior Staffer #2 [REDACTED], and Senior Staffer #3
9 Senior Staffer #3 ?
[REDACTED]

10 A. Yes.

11 Q. Other than just this, can you
12 put your finger on anything that led you
13 to have that feeling that he had [REDACTED]
14 with [REDACTED] [REDACTED] [REDACTED] [REDACTED] ?

15 A. It was -- he would talk very
16 casually with them. It didn't seem like a
17 professional relationship. It seemed like
18 -- like sometimes when he was yelling at
19 Senior Staffer #2, it sounded almost like -- it
20 just wasn't a professional relationship,
21 and I could not for the life of me figure
22 out what was going on. But there was a
23 lot of like personal stuff going on -- I
24 don't know how to even describe it. It
25 was so bizarre.

1

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2 And as my relationship with the
3 Governor grew, my relationship with
4 particularly Annabel, but Stephanie, too,
5 though I think she kind of rose above
6 feeling intimidated by me, but Annabel
7 definitely disliked my relationship with
8 the Governor, and it couldn't make sense
9 like any other way. Because I was not
10 trying to sleep with the Governor, I
11 wasn't flirting with the Governor, I
12 wasn't entertaining these things, but then
13 she would enter the room or enter the
14 situation and it felt like I had stepped
15 on her toes in a way that it didn't make
16 sense to me unless she was coming from a
17 very different place than I was, if that
18 makes sense.

19 Q. And I believe you mentioned
20 earlier tha [REDACTED] Staffer #5 said he thought that
21 Annabel was jealous of you?

22 A. Yes.

23 Q. Did anyone else make that
24 comment to you?

25 A. I think -- I feel like I talked

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1 C. Bennett

2 about it maybe with Staffer #2 [REDACTED] or [REDACTED]
3 Staffer #3. I don't know particulars, but I
4 definitely -- I feel like the tension
5 between us was after a point well
6 understood by junior staffers.

7 Q. If you could turn to tab nine.
8 It's more of your texts with Staffer #5.

9 A. Uh-huh.

10 Q. And this is from August of 2019.
11 And you wrote, "also, he added me to his
12 phone contacts."

13 Is that a reference to the
14 Governor?

15 A. Correct.

16 Q. And you continued. "And we were
17 PINing each other and they were all in the
18 chain. Obviously don't think they liked
19 that."

20 Who was the "they" you were
21 referring to?

22 A. That would be Annabel,
23 Stephanie, Jill is definitely on that
24 chain, though I don't think I ever -- I
25 never got any of that from her, Dani was

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1 C. Bennett

2 typically on those chains. But I really
3 -- it felt the worst came from Annabel.

4 Q. And so what you were saying
5 here, just to make sure I understand, is
6 you didn't think they liked the Governor
7 was now in direct contact with you?

8 A. Correct.

9 MS. CLARK: Why don't we take a
10 lunch break now. Why don't we go off
11 the record and we can talk about that.

12 THE VIDEOGRAPHER: Thank you.

13 The time is 12:42.

14 We're going off the record.

15 (Lunch recess taken at 12:42
16 p.m.)

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2 A F T E R N O O N S E S S I O N

3 May 26, 2021

4 1:34 p.m.

5 THE VIDEOGRAPHER: The time is
6 approximately 1:34 p.m.

7 We're back on the record.

8 C H A R L O T T E B E N N E T T, having
9 been previously duly sworn by a
10 Notary Public of the State of
11 New York, upon being examined,
12 testified as follows:

13 EXAMINATION CONTINUED BY

14 MS. CLARK:

15 Q. You had talked about the issues
16 with Staffer #5 when he was leaving.

17 Did you ever hear any discussion
18 that Stephanie Benton might leave the
19 Executive Chamber?

20 A. I feel like there were rumors
21 about people -- I feel like there was
22 always a rumor of someone leaving at some
23 point, so it's possible that there was
24 like gossip at a point about Stephanie,
25 but I can't particularly recall.

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2 Q. I'm going to ask you to turn to
3 tab twelve in your binder. It's more of
4 your texts with [REDACTED] Staffer #5.

5 And do you know if that's you or
6 him that starts off by saying, "is Steph
7 leaving?" It is a little hard to tell.

8 A. This -- it seems like it's me
9 because [REDACTED] [REDACTED] was a former
10 briefer. But yeah, this doesn't surprise
11 me, though I wouldn't have remembered it
12 without reading this.

13 Q. Do you have any recollection of
14 what [REDACTED] told you about
15 Stephanie Benton possibly leaving?

16 A. She messaged me, because that
17 was the only way we talked, and probably
18 just asked if Steph was leaving. And
19 that's how something like that rumor gets
20 started. I don't know why she would think
21 that. But I think she was talking to
22 other staffers, even though she herself
23 had left.

24 Q. And did you hear anyone ever say
25 why they thought Stephanie Benton would be

1 C. Bennett

2 leaving?

3 A. Uh-huh.

4 Q. You have to say yes or no.

5 A. Sorry.

6 Q. I forgot to give you that
7 instruction at the beginning that uh-uhs
8 and nods don't work for the court
9 reporter.

10 A. Yes.

11 Can you repeat the question?

12 MS. CLARK: I forget the question
13 now.

14 Could the court reporter read
15 back the question?

16 (Whereupon the requested portion
17 was read back by the reporter)

18 THE WITNESS: No.

19 Q. This text exchange with [REDACTED]
20 also talks about the possibility of MDR
21 leaving.

22 Is that Melissa DeRosa?

23 A. Yes.

24 Q. And do you recall anything you
25 heard about her possibly leaving?

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2 A. There was chatter that she would
3 go to the White House, but again, these
4 rumors -- I feel like these rumors were
5 usually serving in some capacity of like
6 who's going where, who's quitting, who's
7 moving on, who's getting promoted, very
8 typical. But I do remember the Melissa
9 DeRosa rumors generally, because people
10 were anticipating the election, the
11 presidential election.

12 Q. So there was talk that, if Joe
13 Biden won, that she would move to the
14 White House?

15 A. That was one of the theories,
16 yes.

17 Q. Any talk of what role she was
18 supposedly going to assume?

19 A. No, nothing that specific.

20 Q. Now, during the time that you
21 worked in the Executive Chamber, did you
22 help out with any recruiting to bring in
23 junior people?

24 A. Yes.

25 Q. And what did you do in

1 C. Bennett

2 connection with that?

3 A. I would reach out to
4 particularly Hamilton students, my alma
5 mater. I think when we were looking for
6 briefers, as [REDACTED] was leaving, and
7 similarly when I left the briefing team, I
8 was definitely a part of finding
9 replacements. I will say that [REDACTED] [REDACTED]
10 is not, in my opinion, very good at
11 finding candidates, and I don't think I'm
12 alone in that opinion, and so it felt a
13 lot easier to reach out to folks who were
14 graduating from our respective alma maters
15 to try to find people to help us.

16 Q. And you say when you were
17 leaving the briefing team.

18 Do you mean when you became a
19 senior briefer or at some other point?

20 A. When I had transitioned to my
21 role as health policy advisor, I was also
22 a part of the search for additional
23 briefers.

24 Q. So which people were you
25 partially responsible for bringing to the

1 C. Bennett

2 Chamber?

3 A. I don't think I ever
4 successfully recruited somebody. [REDACTED]
5 [REDACTED] went to [REDACTED], and [REDACTED]
6 [REDACTED] had reached out to her former
7 professor, and that's how [REDACTED] was
8 introduced to us. I'm not sure how [REDACTED]
9 came to the job. And I believe there is
10 another [REDACTED] grad that is on the team
11 in addition to [REDACTED] now after I fully left
12 the team.

13 Q. And who is that?

14 A. Her name is [REDACTED], I believe.
15 Actually, I did -- I was successful.
16 [REDACTED] -- her name is [REDACTED], I believe it's
17 [REDACTED] [REDACTED], she went to Hamilton and I
18 talked to her last year and she is now on
19 the scheduling team.

20 Q. And when last year did you talk
21 to her about joining the Chamber?

22 A. It must have been June/July.

23 Q. Of 2020?

24 A. Of 2020, correct.

25 Q. So it was when you were moving

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1 C. Bennett

2 to the health policy position?

3 A. Yes.

4 Q. And at that point you were
5 leaving because of your interactions with
6 the Governor, which we're going to come
7 to.

8 Did you have concerns about
9 bringing [REDACTED] into this environment?

10 A. Yes.

11 I think it was very bittersweet
12 even finding other people to join the
13 team. After my experience with the
14 Governor, I was still sad to leave the
15 team, and it was kind of like cognitive
16 dissonance. I felt that like maybe they
17 were young enough and like right out of
18 college that they wouldn't have a similar
19 problem. Like I don't know. I did
20 struggle with it, and I think that's why I
21 ended up telling [REDACTED] ultimately
22 what happened, and I regarded her as like
23 a dear friend, as somebody I would trust
24 in the administration, which was rare, and
25 like kind of in the hopes that she would

1 C. Bennett

2 remain the -- not that I explained this to
3 her, but kind of keep an eye for the other
4 women. She was a little less drinking the
5 Kool Aid I think than some of the other
6 people.

7 Q. When did you tell [REDACTED]?

8 A. I, on a few different occasions,
9 had said it in different ways. I think I
10 tried to explain away my departure from
11 the briefing team as like something
12 personal happened to me, like I'm having
13 personal issues and it means I can't do
14 this job anymore.

15 And then there was one night
16 very end of June in which I told her and a
17 few others while we were drinking that he
18 -- that the Governor acted inappropriately
19 towards me, which is why I left my job,
20 and that was ultimately like the moment
21 when I actually disclosed the truth, and
22 then we had several longer text exchanges
23 about my departure after that period.

24 Q. And the gathering you described,
25 that was at the very end of June?

1 C. Bennett

2 A. Correct.

3 Q. Who else was present for that?

4 A. Staffer #2 [REDACTED], Staffer #3 [REDACTED], [REDACTED]

5 Staffer #4. I think that was it.

6 Q. And which -- did you give them
7 any detail in how the Governor had acted
8 inappropriately?

9 A. No, I just explained that it was
10 inappropriate, I told Jill it was
11 inappropriate, and my job changed, and I
12 kept it very, very brief.

13 Q. Did you become emotional when
14 you were describing it to the people?

15 A. Yes, I was drunk, so I could --
16 yes.

17 Q. Well, let's step back in time a
18 little bit.

19 After you took on the executive
20 assistant role, how often did you interact
21 with the Governor?

22 A. It would vary. So if -- as I
23 said before, if on average he was around
24 about half the week, some of those days I
25 wouldn't have any substantive interaction

1 C. Bennett
2 with him at all, and other times we would
3 have longer conversations. So it really
4 varied.

5 Q. So in the May through the
6 summer, did you have any notable
7 interactions with the Governor?

8 A. Yes. And actually, I'm glad
9 that you asked this.

10 You asked me earlier if he was
11 inappropriate towards me that summer, that
12 year, and I took a very long pause and I
13 said no, and I want to fix that answer.
14 And I think what I was grappling with then
15 and what I'll explain now is that it was
16 in my mind -- at the time like I largely
17 saw him as a father figure. He's a little
18 older than my dad, I'm the same age as his
19 daughters, so I really tried to think of
20 it in that framework. But he was -- like
21 I felt his eyes on me, and I think the
22 conversations we had and the favor from
23 the Governor now to me is grooming and I
24 want to be clear that I feel like his
25 inappropriate behavior did start then, but

1 C. Bennett
2 I wasn't considering it in that light. I
3 was like this is a little like maybe
4 skeevy, but I can handle this and just be
5 like my professional but friendly self and
6 that I think my difficulty in answering
7 your question earlier is that was not
8 obvious to me until it escalated to the
9 point which it did.

10 But we did various interactions.
11 He asked me the length of my previous
12 relationships. He asked me if I was in a
13 relationship. He asked me if I honored my
14 commitments, which I was very early on in
15 how I interpreted him trying to determine
16 whether or not I was trustworthy. We
17 talked about my gym habits, which is
18 largely because that was like a very
19 serious and important hobby to me, but I
20 think looking back inappropriate that -- I
21 don't know, I just feel like it like
22 doesn't feel right to me and I think that
23 was the context in which I was seeing
24 these interactions with Stephanie and
25 Annabel and Melissa.

1 C. Bennett

2 Sorry, I interrupted you.

3 Q. Let's pause there.

4 So you used the phrase

5 "grooming."

6 What did you mean by that?

7 A. I define grooming as a set of
8 behaviors that establish a friendly
9 relationship in which certain
10 interactions, certain friendly behaviors
11 are acceptable. It's building a
12 foundation on which to then take advantage
13 of that foundation and cross a line in a
14 major way. When he's asking me about if
15 I'm in a relationship a few weeks after I
16 met him, in that moment I'm not thinking
17 of it in any significant light, but then a
18 year later if he's asking me if I sleep
19 with older men, the only way he can get to
20 that question is to first start with a
21 relationship with me in which it's even
22 okay to ask about my romantic life at all.
23 So I think it's about priming the person
24 in which you're grooming to slowly accept
25 escalating behavior.

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1 C. Bennett

2 Q. And you said he asked about your
3 prior relationships.

4 When did he do that?

5 A. That was the first month I was
6 working directly for him.

7 Q. And what did you tell him, if
8 anything, about any prior relationships?

9 A. I said that I was not currently
10 in a relationship. I explained that my
11 last relationship ended, and then after it
12 had ended, my ex-partner was hit by a car
13 or a van in New York City, [REDACTED]

14 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

15 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

16 [REDACTED] and that I left my job in D.C.

17 to [REDACTED] [REDACTED] [REDACTED] [REDACTED], and that was
18 the reason I was looking for a job in New
19 York.

20 Q. And when he asked you whether
21 you honored your commitments, when was
22 that conversation?

23 A. That was in May. That was one
24 of the first weeks I had met him.

25 Q. And when he asked if you honored

1 C. Bennett

2 your commitments, what did you say to him?

3 A. I said yes. The first answer I
4 gave was like I graduated, I honored my
5 commitment to school, like I saw myself as
6 a very serious student. And at that time
7 if I were talking to my friend and they
8 asked that question, I would have talked
9 about my campus sexual assault activism on
10 campus, and I was not at that point at all
11 sharing that with him, so I just mentioned
12 school as like a vague like I did it. And
13 so he asked me where did I go to college,
14 what did I study, and he -- at one point,
15 it was either when I first met him when he
16 originally asked me where I went to
17 college or in this conversation, but he
18 was like testing me on who was the
19 president of my college. And then he was
20 like okay, yeah, like another commitment,
21 because that wasn't satisfactory. So
22 that's when I was explaining that my
23 commitment was to the people in my life
24 and I committed to taking care of someone
25 who took care of me.

1 C. Bennett

2 Q. And you said that you noticed
3 that his eyes were on you.

4 What did you mean by that?

5 A. Like taking in my outfit.

6 Q. Like looking you up and down
7 sort of thing?

8 A. Yes.

9 Q. And you said he also asked you
10 about your gym habits.

11 What did he ask you about that?

12 A. We got into a longer
13 conversation about -- I'm not even sure
14 how it started, but I actually talked to
15 him -- because I was also living with my
16 parents at the time. I talked to him a
17 lot about my parents, and that's how I
18 relate to him in a lot of ways. He has a
19 similar not personality, because I feel
20 like this would be an insult to my father,
21 but they are similar in certain ways and
22 they both like motorcycles, they both like
23 sports, and they -- we would talk about
24 skiing and we would talk about the gym and
25 we would talk about motorcycles and we

1 C. Bennett
2 would talk about cars and he told me to
3 get like a grill for my dad for Father's
4 Day, which I absolutely did not do. But
5 it was kind of the gateway into like,
6 yeah, I'm boxing right now, I take the gym
7 really seriously, these are the hobbies I
8 do but these are also the things that I
9 share with my dad. We talked about my
10 parents and talked about -- he asked how
11 many like push-ups I could do, and that
12 was ultimately the beginning of the
13 push-up competition.

14 Q. And when did that start with the
15 push-ups?

16 A. That must have been in the --
17 that was in the summer of 2019.

18 Q. And did that continue past the
19 summer?

20 A. Yes, that continued until --
21 actually, I think he even mentioned it in
22 our COVID interactions, so even 2020.

23 Q. And did there come a time when
24 he asked you to do push-ups in front of
25 him?

1 C. Bennett

2 A. Yes.

3 Q. Did that happen once or more
4 than once?

5 A. Once. But it felt like -- I had
6 almost been anticipating it, because it
7 felt like he kept bringing it up. Like
8 eventually he's just going to be like just
9 get on the floor and do the push-ups. So
10 it happened once, but it was like after
11 conversations.

12 Q. Was anyone else present when he
13 told you to do push-ups?

14 A. No.

15 Q. Did he do any push-ups?

16 A. He did one push-up one time
17 before this interaction in which he was
18 like -- and again, in hindsight this gives
19 me -- this makes me uncomfortable, he was
20 like how far down do you go, and he put
21 like an ornamental plate that has a stand,
22 so it's upright and it's probably like an
23 award of some kind he had on the shelf and
24 he put it on the floor and then he was
25 like try to make an example of how far

1 C. Bennett
2 down he would bring your chest to a
3 push-up, but it didn't work because the
4 plate was like a plate which was pretty
5 high and it didn't actually -- it was very
6 awkward, and then he got up.

7 But no, he never got down and
8 did like sets of push-ups, no.

9 Q. If you could turn to tab
10 sixteen, it's more of your texts with [REDACTED] Staffer #5
11 from October of 2019 where you wrote, also
12 an update, he just made me do twenty
13 push-ups.

14 Is that when that incident
15 happened?

16 A. Yes.

17 Q. It then says, "loved a woman
18 after my own heart."

19 Do you know what that's a
20 reference to?

21 A. So I think on iMessage, I don't
22 know what [REDACTED] Staffer #5 was referring to when he
23 said, "a woman after my heart." But I
24 think it -- it didn't have to do with
25 push-ups.

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2 Q. And at the end █ wrote, "so
3 he's in with nothing to do but pick on
4 you."

5 Is that the feeling you had?

6 A. Yes, he would get bored and
7 didn't really have a life.

8 Q. If you turn to tab seventeen,
9 this is images you produced.

10 Who are these texts with?

11 A. These are my parents.

12 Q. At the bottom you wrote, "Gov
13 and I are going to live together in his
14 mansion gym." And this is from August of
15 2019. "Are going to live together in his
16 mansion gym."

17 Is that something that the
18 Governor proposed to you?

19 A. Yes. It was definitely not
20 something I took seriously, but yes, he
21 mentioned that he had a gym at his house
22 and that I should see it.

23 Q. If you turn the page, your mom
24 writes, "that photo wasn't enough."

25 Do you know what that's a

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2 reference to?

3 A. I -- I am not sure. It could
4 have been -- no, I'm not sure.

5 Q. And further down your mom says,
6 "how did this plan hatch," and you
7 describe him asking what you did for
8 sports and leading to him asking how many
9 push-ups.

10 Is that how you recall the
11 conversation taking place with the
12 Governor?

13 A. Yes.

14 Q. On the next page further down
15 you wrote, "he was like do you have a BF.
16 I said no."

17 Is that a reference to
18 boyfriend?

19 A. Yes.

20 Q. And then you continue it. "He
21 said, well, that's why, you could beat
22 them all up."

23 Is that something that the
24 Governor said to you?

25 A. Yes.

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2 Q. And if you'd like at tab
3 eighteen. You wrote -- this is to your
4 parents again -- it's a little blurrier.

5 A. Correct, this is from my
6 parents.

7 Q. And that's you writing, "did the
8 push-ups for him today. He freaked out.
9 He looks scared now. I just kept going
10 until he told me to stop and didn't slow
11 down."

12 Is that what happened?

13 A. Yes, that is what happened.

14 Q. And describe how he looked where
15 you say he freaked out, he looked scared.

16 A. He just -- I literally don't
17 believe -- he just didn't believe that I
18 could actually do a single push-up is the
19 look that was on his face, and then he,
20 you know, as it says, that he was like I
21 don't know many people who can do push-ups
22 like that.

23 Q. And further down it says, "and
24 then before he left, he was like that was
25 scary, I'm officially scared."

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2 Is that something he said to
3 you?

4 A. Yes. He gave me a fist bump as
5 well.

6 Q. In the early months, May through
7 the summer -- I cut you off to pause for
8 these -- what other things do you recall
9 the Governor doing that made you
10 uncomfortable or you thought might be
11 inappropriate?

12 A. Yeah, I feel like this was
13 inappropriate, and I feel like the
14 questions about my personal life were
15 inappropriate and it was the inquiry where
16 at the time I was just trying to form a
17 relationship with my boss and also like a
18 very clear context of telling this to my
19 parents, like I did not feel like this was
20 the beginning of him grooming me but I
21 think within the context of feeling ogled
22 or the personal questions, yeah.

23 Q. When you were doing the
24 push-ups, how close to you was the
25 Governor standing?

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2 A. He was sitting at his desk.

3 Q. And describe to me where you
4 were in relation to his desk.

5 A. I was feet from his desk. I
6 don't remember exactly, but I even feel
7 like I was half in Stephanie's office,
8 like my legs may have been in Stephanie's
9 office. I don't remember, but I wasn't --
10 like he wasn't like standing over me.

11 Q. Could he have a clear view of
12 you while you were doing the push-ups from
13 his desk?

14 A. Yes.

15 Q. And did you feel he was ogling
16 you or looking you up or down or anything
17 like that when you were doing the
18 push-ups?

19 A. I felt at the time that -- and
20 to be fair, I don't remember what I was
21 wearing, but I felt safe in what I was
22 wearing. Like there are some blouses that
23 you absolutely are not going to get down
24 and do push-ups because they will fall
25 open, and that was not the case, and I

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2 remember feeling at least good about that.

3 Q. Did the Governor ever ask you to
4 sing for him?

5 A. Yes, he did.

6 Q. When did that happen?

7 A. That was in I believe May. It
8 was very early on working for him
9 directly.

10 Q. And tell us how that came about.

11 A. In one of my earlier meetings
12 with him, he called me into his office,
13 and at this point I still didn't know him
14 very well, I didn't know my role very
15 well, [REDACTED] was still around, so it was very,
16 very early on. So when I get called into
17 the office, it's like immediate
18 adrenaline. I don't know what could
19 happen, anything could happen. I go, I
20 sit down across from him, and he had
21 lyrics to Danny Boy and he asks me if I
22 know the song. We kind of discuss the
23 song, he reviews the lyrics a little bit,
24 and then hands them to me and asks me to
25 memorize them. And I take it. You know,

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2 I tried to kind of like play it off, but I
3 was actually literally struggling to
4 memorize these lyrics, because I didn't
5 really know the song very well, not that
6 it matters.

7 I sat back down with [REDACTED] Staffer #5 and I'm
8 trying to memorize these lyrics and he
9 like would pop out of like the side door
10 of his office, so not the door that he
11 usually uses where it goes straight to
12 Stephanie's office but the side door that
13 pops right out to my cubicle, and he would
14 like poke his head out and ask me to
15 start, and it was kind of like a day of
16 sitting with these lyrics. And then at
17 one point Melissa walks into Stephanie's
18 office, the Governor is I guess at that
19 point in Stephanie's office, Stephanie I
20 believe is at her desk at this point, and
21 he calls me in and asks me to -- he asked
22 me to sing Danny Boy.

23 And I don't know if I had
24 started yet, but Melissa was just like --
25 even she was like -- she said, she was

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2 like, this is hazing. And I turned to her
3 and I said, yes, this is hazing, like
4 trying to be confident but like jovial
5 enough that I'm not like about to like get
6 angry but yes, this is hazing. And then I
7 turned back to the Governor and I start
8 reciting the lyrics, just simply speaking
9 the lyrics. And then he asks me to stop
10 and asked me to sing. And I was like I'm
11 not going to sing. He was like, no, no,
12 you have to sing. I'm like I'm not going
13 to sing. He was like, we'll do it
14 together.

15 So he starts singing and I'm
16 like kind of singing along with him, but
17 it's like very tragic -- it just didn't --
18 Melissa and Stephanie are kind of
19 horrified and it falls apart, and I don't
20 think -- I think he maybe actually tried
21 to get through the whole song, but I
22 didn't know the lyrics and I wasn't like
23 going to sing, I was more just like
24 following his lead, and then I sat back
25 down at my desk with Staffer # .

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2 Q. Did the Governor ever tell you
3 why he wanted you to memorize Danny Boy or
4 why he had the printout of the lyrics or
5 anything about any reason for any of this?

6 A. No. But when I sat down, [REDACTED] Staffer #5
7 just said like I told you, like he's
8 testing you, he's testing your
9 temperament, your confidence, your ability
10 to handle yourself, anxiety, your memory.
11 And I just -- at that point I was like,
12 well, all right, this is what I have to
13 do.

14 Q. If you could look at tab
15 thirteen. And this is a document that you
16 produce to us.

17 What is this?

18 A. This is a conversation with my
19 best friend [REDACTED], and I'm explaining the
20 day. He asked if I honored my
21 commitments, he asked about my
22 relationships, yes, he asked also how long
23 my relationships were, in addition to the
24 other things that I had previously
25 mentioned. And [REDACTED] drunk and joking

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2 around. She says, "at least all of your
3 relationships lasted longer than they
4 actually should," which at that point was
5 true. And I'm explaining, I told him I
6 stuck by the people in my life. I told
7 him about [REDACTED], who was my former partner
8 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

9 Q. And it looks like on the second
10 page that asking you to memorize the
11 lyrics to Danny Boy was the same day he
12 asked you if you honored your commitments?

13 A. Yes, it does seem that. Yes.

14 Q. And these texts run May 16,
15 2019.

16 You texted [REDACTED] about it the
17 same day it happened?

18 A. Yes.

19 Q. And if you look at tab fourteen,
20 are those texts with your mom?

21 A. Yes.

22 Q. And that's also from May 16, and
23 you told your mom about the Danny Boy as
24 well?

25 A. Yes.

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2 Q. Were there any other occasions
3 where the Governor asked you to sing or
4 memorize a song?

5 A. No.

6 Q. If you could turn to tab
7 fifteen.

8 A. Oh, my God.

9 Q. This is a text from you to [Staffer #5]
10 dated January 1, 2020 saying, "he just
11 asked me to sing Bohemian Rhapsody, so."

12 A. I totally forgot about that
13 until seeing this message. And I barely
14 remember the interaction. But yeah, that
15 was New Year's Day.

16 Q. Now that you've seen that, do
17 you remember anything about what happened
18 in that interaction?

19 A. I think I just was like I'm not
20 singing -- I think he started singing and
21 I was just like I'm not singing that. I
22 don't remember, but I think I -- I don't
23 remember quite well, but I really don't
24 think I sang it.

25 Q. And you had to work on New

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2 Year's Day?

3 A. Oh, 9:00 a.m. I was in the
4 office, yes.

5 Q. Was it staffed the way it would
6 be on a weekend, or was everybody in on
7 New Year's Day?

8 A. It was Melissa, the Governor,
9 and myself.

10 Q. Do you recall if there was a
11 particular event or occasion that was
12 requiring you to be there on New Year's
13 Day?

14 A. Just it's also, in terms of who
15 else was there, it's possible that there
16 was staff that popped in and out. But I
17 was staffing the Governor on New Year's
18 Day. I don't know why he was there. I
19 got his coffee, I got them lunch, I waited
20 for them to leave. There may have been an
21 event. I don't particularly remember.
22 But yeah, I do remember working that day.

23 Q. Did the Governor ever make any
24 comments about the size of his hands?

25 A. Yes.

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2 Q. How often did he make comments
3 about the size of his hands?

4 A. To me just once, but it was
5 something that other people had mentioned,
6 just that like he has kind of -- well,
7 like kind of -- will really kind of grab
8 you and has large hands. And he was
9 asking me one day -- I was sitting at
10 Stephanie's desk and [REDACTED] [REDACTED] was
11 sitting at my desk and he was asking me
12 where -- I don't know what the exact line
13 of questioning was, but I remember talking
14 about [REDACTED] [REDACTED]. He was asking
15 like who went where and who's who. He
16 doesn't really know what's going on in the
17 office, so he was kind of doing that line
18 of questioning, and I was explaining that
19 [REDACTED] had my job before I did. He had
20 met [REDACTED] and she had staffed him on
21 several occasions. He asked where she
22 went, and I told him that she now was
23 working for the [REDACTED]. And he was like,
24 okay.

25 And then he asked me maybe what

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else people had said about him, and I wasn't really sure. I think we had like an exchange of, you know, here are some like very brief things to know about the Governor before starting this job, and I think maybe his -- I'm not sure if I mentioned his hands or he mentioned his hands, but he wouldn't let it go and kept asking and talking about the size of his hands and was like kind of engaging me in this what became very uncomfortable interaction in which I was more scouring my brain for like a positive thing people had said to him about this job and it turned into him sticking to this point and like pointedly joking and asking me and talking about his hands and the size of them. And at this point Annabel like stepped in front of me and said something to him that was like kind of riffing off of his line of jokes, and that to me was -- I couldn't help it in those moments. She felt like she was interrupting something where I was like okay, thank

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2 God, like she's here and she stepped in.
3 But I think in her mind she was like I'm
4 going to step in front of her because I
5 can and I'm asserting my dominance where I
6 was like trying, like get me out of this
7 interaction. And it just felt -- like
8 when I mentioned it, it was like shake his
9 hand, he has really large hands, just like
10 became him trying to get me to admit
11 something sexually; what do people say
12 about that, that kind of trying to get me
13 to say more.

14 Q. Do you recall anything else he
15 said about the size of his hands?

16 A. That was the only interaction.
17 I don't remember much. I really was just
18 trying to like thread this needle of not
19 making him angry but also maintaining my
20 -- what I see as appropriate behavior.
21 Like I'm not crossing this boundary with
22 you but I'm also not looking to get into a
23 fight with you and losing my job. That
24 was the boundary and I was very focused on
25 that and less listening to what he was

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2 saying.

3 Q. What did you have a feeling that
4 he was trying to get you to say in this
5 exchange?

6 A. I think he was trying to get me
7 to say that it indicates other parts of
8 him are large, and I just don't -- like
9 that is so -- that makes me so
10 uncomfortable and I just want to like --
11 sorry, that just -- yeah. I'm sorry.

12 Q. No need to apologize. Any time
13 you need a break, let me know. I don't
14 want to make you uncomfortable.

15 But did you understand that he
16 was seeking to a comparison of the size of
17 his hands and the size of his genitals?

18 A. Yes, that is absolutely what he
19 was trying to get me to say, yes.

20 Q. Did the Governor ever make any
21 comments about your appearance, either
22 positive or negative?

23 A. I'd say both. Like when it was
24 my birthday, he asked like why I was like
25 all dressed up. It would be like sunny

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2 out and I would be wearing like booties
3 and he would ask me why I was wearing cold
4 weather shoes. He went out of his way to
5 comment on my hair, and this was in the
6 fall of 2019.

7 And this one hit me -- all of
8 these isolated incidents, I felt like you
9 could brush them under the rug, but this
10 was very clear to me, and this was a
11 moment in which I was like that's sexual
12 harassment, and I like very well
13 understood what was happening at the
14 moment.

15 But he showed up for the day.
16 Meanwhile, I'm a mess because I'm working
17 two jobs, I'm exhausted. I threw my hair
18 into a bun in the morning and when he's
19 arriving, I say hello, and usually he'll
20 say hello. And he just asked me -- he
21 just like commented on the fact that I had
22 a bun. I don't know if he asked why I was
23 wearing a bun or just said your hair's in
24 a bun, but he commented on my hair and
25 that was all I got from him.

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2 And then the day went by and I
3 didn't see or talk to him until he was
4 leaving for the day and I said good-bye,
5 and he stops, turns around, walks towards
6 me, walks like behind my cubicle, and is
7 standing over me and I'm sitting in my
8 swivel chair and he asked me why I put my
9 hair in a bun today.

10 And I was not prepared for that
11 interaction, but I was stewing on the fact
12 that he had previously commented on my
13 bun. So at that point I was like -- you
14 know, it was like messy, or I kind of made
15 an excuse. And he was like -- I was like
16 what, you don't like it, not looking for
17 his approval but like a what's wrong with
18 my bun sort of attitude. This is like a
19 little saltier than I would usually act,
20 because I was like just actually very
21 angry. He's like, no, and then he starts
22 like kind of leaving me again. I was
23 like, oh, you don't like my bun, and I'm
24 like leaving over my cube, and then I
25 stand up and I'm kind of addressing the

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2 other assistants at their cubes and being
3 like, did you hear that; he doesn't like
4 my bun, and I'm like kind of calling after
5 him, and he walks away. And then I start
6 -- I was like kind of in a crying rage and
7 just left, left work.

8 And then he called me bun for a
9 bit, a month or something.

10 Q. When you stood up and were
11 saying to the other assistants, "oh, did
12 you hear that," who was present?

13 A. I believe it was [REDACTED] [REDACTED]
14 and Staffer #1 [REDACTED].

15 Q. And did either of them ever
16 comment to you about you standing up and
17 making that comment or what the Governor
18 said to you?

19 A. I brought it up on multiple
20 occasions after the fact because I was so
21 bothered by the comment, so I don't know.
22 We may have had an interaction after he
23 left, but I also was bitter, so I brought
24 it up on separate occasions after the
25 fact.

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2 Q. I'm going to ask you to turn to
3 tab nineteen. And you produced these,
4 these are texts between you and Staffer #5 that
5 are in the more traditional format. And
6 it's dated November 18 and you said, "he
7 only spoke to me twice today and both
8 times it was to tell me he didn't like how
9 I did my hair, so definitely quitting.
10 LOL."

11 Is that the bun incident?

12 A. Yes.

13 Q. Anything else happen in the fall
14 of 2019 that you thought was crossing a
15 line or getting close to a line?

16 A. I think these are the big ones
17 for me. I think the bun was one of the --
18 it sounds maybe small, but like to me this
19 was very big. And I feel like we hit on a
20 lot of the very memorable ones for me.

21 That's what I can remember right
22 now.

23 Q. Let's move to 2020, from the
24 beginning of the year until COVID hits.
25 We can use COVID as the demarcation.

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2 What, if anything, happened in
3 that time period?

4 A. On the 19th of January, I was in
5 Albany, we were preparing for the Governor
6 to present the executive budget in a few
7 days, and I was just like there to help
8 kind of an all hands on deck. I felt like
9 I needed to be there and it was kind of
10 expected of me, and I ended up -- Annabel
11 asked me to go drop off a speech at the
12 mansion.

13 On my way, she calls me and
14 tells me not to drop that speech, which
15 means like if he gets his hands on it,
16 you're in trouble. Instead you need to go
17 pick up the PowerPoint he has. I was like
18 I'm on my way, I was walking, running.

19 So I get to the gate and I was
20 like I need to pick something up.
21 Traditionally, when you're picking
22 something up, he would give it to somebody
23 to give it to somebody. A trooper comes
24 to the gate and I would collect the
25 PowerPoint that way, like that's how I

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2 would be picking something up from the
3 mansion in a traditional pickup. A
4 trooper at the gate said I've got to wait,
5 I've got to contact him or something. And
6 I was like it's very cold, it's January,
7 and I was kind of like waiting. He was
8 like, go into the command center, which is
9 like where all the troopers sit, it's kind
10 of like their office space, you can wait
11 in there.

12 So I walk across the parking lot
13 to the command center and sit down and I'm
14 kind of waiting. They're also waiting.

15 And finally he -- I either -- he
16 tells them to send me to the pool house,
17 that he was in the pool house, or he just
18 said tell her to come here and they said
19 to me he's in the pool house, some
20 instruction of that kind.

21 I don't know where the pool
22 house is, so they're like kind of giving
23 me instructions.

24 I make my way up. I'm nervous,
25 because I didn't dress as if I'm about to

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2 see the Governor. My plan was not at all
3 to see the Governor even that day, Sunday.
4 I was just kind of there to be helpful to
5 my team.

6 And I make my way to the pool
7 house, I can hear the TV, so I continue
8 past like a pool table on the inside, and
9 he's sitting there watching CNN kind of
10 flipping through his PowerPoint, the
11 executive budget PowerPoint, and I'm
12 standing there kind of awkwardly because
13 I'm under the impression I'm to pick it
14 up, so it's like hand it to me and then
15 I'll leave, and he asked me to sit down.
16 It's kind of an L-shaped couch, so I make
17 my way all the way around and then sit not
18 next to him, like a good amount of space,
19 and I'm just kind of sitting there
20 waiting, like kind of watching CNN kind of
21 waiting for instruction, feeling a little
22 bit awkward.

23 And he is like all right, tell
24 me something, tell me something, like
25 gossip, kind of in his gossip mode, seems

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bored with the PowerPoint. I don't have anything to tell him. I think at one point I said like everyone is working hard or something stupid, like everyone is tired, which he definitely doesn't want to hear, or something to the effect of like the staff, the staff mood, and he's more looking for gossip. And he's persistent, like tell me something, tell me something.

11 So finally I say, in 2015, you
12 signed Enough is Enough and it changed my
13 life. And he puts his pen down and moves
14 his PowerPoint to the side and is like
15 fully engaged in this conversation. And I
16 -- we kind of enter this winding
17 conversation in which I say it's part of
18 the reason I'm here doing this work, and
19 in a lot of ways it felt like I had been
20 not waiting to tell him but like if this
21 person who I spend every single day trying
22 to cater to is going to invest in me at
23 all, like he should know that this is the
24 foundation of why I show up every day, and
25 that was kind of just conversation in

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2 which I explained that I was assaulted and
3 abused in college and I reported it to the
4 college and the investigation was just
5 horrible, the policy was not great, they
6 really just didn't do it justice, and I
7 let the campus know exactly what happened,
8 I let them know what happened to me, and I
9 let them know how the college responded,
10 and I started a larger conversation about
11 our policy about our educational
12 programming, about what we're going to do
13 and how we talk to each other and all
14 these different things, and that Enough is
15 Enough is one of the first cases that
16 actually was under the new law, and so the
17 school was kind of grappling with Enough
18 is Enough as I was reporting this. And I
19 ended up studying it as part of my senior
20 thesis in which I did a survey and all
21 these different things, so it was very
22 much an academic endeavor for me.

23 And he said, do you know what
24 the cone of silence is. Yes. And he was
25 like, what is it. You know, just stays

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1 between us. He's like, yep. And he was
2 like, I'm going to tell you something, but
3 you can't talk about it. I was like,
4 okay. And he said, [REDACTED] was also
5 assaulted in college and it's been so
6 hard. And she didn't want it to be
7 investigated, she didn't want it to be
8 reported, and I kind of pushed her, and he
9 kind of described this tension he had [REDACTED]
10 [REDACTED] as it related to the
11 impacts of campus sexual assault, and he
12 used the word "enlightened," which is
13 problematic, of like how my response.
14 He's like wondering what that did for me
15 and my family and what that meant, and
16 kind of started this winding conversation
17 of what happened to me. And within that
18 he asked some I thought pretty
19 inappropriate questions, but I assumed it
20 was -- not even assumed, I'm talking to an
21 old white guy and he doesn't necessarily
22 know what's an inappropriate question to
23 ask, and I feel like I dealt with that --
24 I feel like when you're studying these

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2 things, you kind of meet all types of
3 people who have some -- know idea how to
4 speak to a survivor or about it at all and
5 I was like this man is lost, but he's
6 trying his best and asking me like what
7 exactly happened to me or what exactly the
8 policies like I thought were problematic,
9 and that gets like very graphic.

10 And I gave him like top line,
11 but I still felt uncomfortable. And he
12 was kind of like, oh, well, some people
13 have it much worse, and then he was kind
14 of like talking about his own family and
15 his experience. And he said that he
16 couldn't get the school to budge with
17 anything, like he tried everything, and
18 they just kind of -- not that the same
19 thing that happened to me happened to [REDACTED]
20 [REDACTED], but that it's really hard to
21 come forward with a complaint even when
22 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
23 [REDACTED], and that is what he saw in his
24 experience and talking about that.

25 He told me that I shouldn't

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2 pursue it professionally though after all
3 this, that was his opinion, that I
4 shouldn't base my career on something that
5 happened to me in college. And I
6 explained like, no, this has been in my
7 life and it's something that I've dealt
8 with before college even.

9 And then he kind of like asked
10 me when, as like, when was the first time
11 kind of questioning. So I said I was
12 [REDACTED]. And he reiterated, I just don't
13 think you should base your life off the
14 pain that you've experienced. And I was
15 like kind of trying to take his advice in
16 stride. And he said -- he was like,
17 listen, there's so many things you can
18 learn and there's so much you can do and,
19 you know, you're always going to be on the
20 losing side of this issue. No one is ever
21 going to give up power. People in power
22 are never going to give up power. He said
23 that almost word for word. And he said
24 that -- he was kind of describing sexism
25 at large. But just like it's in the

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2 bedroom, it's in the boardroom, it's like
3 a much larger everywhere. I was like I
4 know, I know. But I was like really
5 trying -- like I appreciated the way in
6 which he was attempting to meet the
7 moment, and I saw it as a good faith
8 effort in that moment, though looking back
9 I take his comments to be coming from
10 someone who himself is a perpetrator, the
11 whole thing disturbs me now.

12 And then we talked about the
13 briefing book. He asked me -- I was like
14 maybe I'll go to law school. He was like
15 don't go to law school. We talked about
16 different programs and I was like what if
17 I did like a JD joint degree, you know,
18 like a Ph.D./JD, I was just kind throwing
19 things out there that I had been looking
20 at at the time, and he like didn't really
21 know much about those programs and he was
22 like, it sounds interesting. And he was
23 like I've been telling [REDACTED] to go
24 into business, not go to law school. He
25 was like go into business, go into

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2 business.

3 And then he was saying -- he
4 asked me how I liked my job, I said it was
5 good, and that everything is -- it's
6 amazing. I get to see his like homework.
7 I get to have my hands on that every
8 single day, and that's such a valuable
9 learning experience for me, and I kind of
10 described that. And he was like good. He
11 was like you should stay in that role. I
12 think you have a lot to learn. And I just
13 like really valued that he was even
14 engaging in this level of talking to me
15 about my career. I feel like it just is a
16 lot coming from this person, like the
17 entire universe of this office is
18 surrounded by this person and for him to
19 like take a moment to reflect on my career
20 was like a very important moment at the
21 time. He said there's too much
22 information in the book. He was like, you
23 know, if I'm signing a bill about like
24 labor laws or a labor bill, I don't need
25 to know the history of labor law. And I

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2 was like I know, I know, but you get the
3 questions, you get yelled at, do we have
4 this, do we have XYZ, where's this. And
5 it has to have that and that's why they
6 have so much stuff in there, and he was
7 yeah, I know, I know. I was like, well,
8 you think of anything, if there's anything
9 that I can do or the book should be, I
10 want to know that. And he was like, yeah,
11 yeah, I'll think about it. And the
12 conversation was winding down at that
13 point, and then we walked out of the pool
14 house together.

15 And then I returned to the
16 Capitol.

17 Q. How long was that conversation?

18 A. It was significant. It was well
19 over an hour.

20 Q. And you described sort of how
21 you look back on it now.

22 At the time did you view it at
23 the time as a positive conversation?

24 A. I had weird feelings about some
25 of his comments but I really -- as I said,

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2 I genuinely interpreted him as trying his
3 best to be a thoughtful person in that
4 moment, even though it felt weird to give
5 -- how about this: There are very, very
6 few people I've spoken to in my life about
7 sexual violence who asked me directly the
8 violence itself, what was it. And in the
9 moment I really tried to reason that as he
10 doesn't get that that's inappropriate or
11 that that's just like a line most people
12 do not cross, and I didn't feel great
13 about it. But I have shared that openly
14 with my whole campus, and it's something
15 that people in my life do know, and even
16 in that moment I was like woah, that was
17 not a question I was expecting, but I
18 answered it.

19 Q. If you could turn to tab
20 twenty-one.

21 This is a text exchange with
22 your mom?

23 A. Yes.

24 Q. And was that the day of the
25 conversation?

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2 A. Yes.

3 Q. And if you look at the tab
4 before, tab twenty, it's another one of
5 the tiny type Staffer #5 █ text exchanges that
6 says, "tough, too, because things with Gov
7 have been really good." That's dated
8 1/28/20.

9 Was there anything else going at
10 the time on in January that had you
11 describing things as going really well
12 with the Governor at that time?

13 A. No, that single conversation I
14 felt like I had been desperately seeking
15 to exit the Executive Chamber, and that
16 conversation gave me a second wind.

17 Q. Anything else notable happened
18 between the beginning of 2020 and COVID
19 hitting?

20 A. Nothing that I am remembering
21 right now that's significant. That felt
22 like the real -- the last like unusual
23 interaction I had with him before the
24 virus.

25 Q. So then the virus hit, and you

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2 described earlier that you were asked to
3 go up to Albany; correct?

4 A. Correct.

5 Q. And where were you working out
6 of in Albany?

7 A. I was working out of the new
8 front office, which was actually outside
9 of his secure office area. It was across
10 the hall and it was -- I was sitting with
11 his other EAs that usually work in Albany.

12 Q. And who were the EAs you were
13 sitting with?

14 A. Executive Assistants #2 & [REDACTED] [REDACTED] [REDACTED],
15 and Alyssa McGrath.

16 Q. And did you share the space with
17 them throughout the rest of your time in
18 the Executive Chamber?

19 A. Yes, until I switched jobs.

20 Q. So once you went up to Albany,
21 you said you didn't see the Governor as
22 much during the COVID; correct?

23 A. Correct.

24 Q. When's the first time anything
25 happened during COVID that is notable?

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2 A. So I got up there on March 23
3 and I didn't see him until a few weeks,
4 maybe mid May. And it was early in the
5 morning I got an e-mail asking me to drop
6 off briefings. And at that point the
7 traditional drop-off format in Albany is
8 you leave it on the trooper desk and then
9 you e-mail Stephanie and you say blah blah
10 briefing is on the trooper desk, and then
11 she'll come out of the locked secure
12 office space that they have for COVID
13 precaution, are kind of isolated, she'll
14 come out, grab the folder, and go back
15 inside.

16 So I'll like just throw on
17 leggings and like kind of a sweatshirt,
18 I'm a mess, it's early in the morning. I
19 run to go print the briefing, and it
20 occurs to me, as I'm dropping the briefing
21 off, that no one's in the office because
22 it's so early. And so I kind of -- at
23 that point I was like, oh, fuck. So I
24 asked the trooper to let me into his
25 office.

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2 And I had actually never been in
3 the Governor's office in Albany, I had
4 been outside of it where the EAs sit on a
5 normal non-virus day, but I had never
6 before been inside his actual office, and
7 so I kind of just like walked back there
8 and I'm in like sneakers, a sweatshirt,
9 and no makeup, and I just throw -- not
10 throw it but just kind of like place the
11 folder on the coffee table and turn around
12 to get out of there. And he's laying down
13 on the couch with his feet up and he's
14 like wait, wait, wait, wait, wait. He's
15 like come back here. I like go and stand
16 at the door. And he's like something to
17 the effect of like where have you been. I
18 haven't seen you around. I'm like hey.
19 He's like, how long have you been in
20 Albany. I was like I don't know, like
21 sixty days, because at that time I was
22 counting. And then he asked where I was
23 staying. And then one of the first
24 questions was asking me who I was hitting
25 on and who was hitting on me. And I'm

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2 still standing in the doorway and he's
3 still laying on the couch and I'm kind of
4 like looking down at him, the couch is
5 like -- comes right to the doorway. And I
6 dodge questions and kind of give him some
7 office gossip of like the fact that no one
8 -- like it was still at that point a very
9 small operation in Albany. We're kind of
10 talking about the virus. It was like a
11 very casual. Besides asking me if I'm
12 hitting on people, it just felt like we're
13 catching up.

14 And then I mentioned that I have
15 a speech for my alma mater. It was like
16 big for me in that moment of my life and
17 something I actually was like hoping to
18 like share with him. And I was operating
19 off of the last real conversation we had
20 from January, like I would love to share
21 what is an exciting development of
22 returning and talking to these students
23 who are about to graduate, so I mentioned
24 it. He's like, sit down.

25 So I grab a chair from the other

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1 side of his desk and bring it around to
2 the other side of the coffee table and he
3 sits up, and we're chatting. He asked me
4 about my parents, because he knows I live
5 with my parents, or I lived with them at
6 the time. And we start talking about my
7 speech. And he asked me what I'm going to
8 say. And I launch into something like
9 talking about the pain of whatever. And
10 he stops me and he's like, it's not pain,
11 it's injustice, and that actual
12 clarification is something that I included
13 in my speech as like when I brought this
14 up to the Governor, he corrected me and
15 said it's not pain, it's injustice. I
16 literally put those lines into my speech.
17 But he is saying that to me. He's like
18 it's injustice, it's betrayal. And then
19 he was like you were raped, you were
20 raped, you were raped and abused and
21 assaulted. Now he's using his hands to
22 point at me to like put a point on it, and
23 he continues to repeat himself. You were
24 betrayed, you were raped and abused and
25 betrayed,

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2 assaulted and betrayed, and he's kind of
3 staring me right in the eyes, and I
4 realize in this moment that that's not an
5 accident and that he is actually trying to
6 trigger me, because no person in their
7 right mind speaks to somebody and thinks
8 that that's a positive interaction. And I
9 was like okay, he's testing me, so like
10 just nod or say yes. And then he -- I'm
11 like okay, he's in a bad mood.

When I had arrived at the office, we were kind of chatting and catching up, though not appropriate, it felt like very much within the scope of our relationship, as sad as that is, and this was like all right, I don't know what's going on. This is fucking bizarre.

19 And then he just like goes off
20 on a tangent about my speech and telling
21 me about my speech and trying to write my
22 speech for me. He gets up, goes to his
23 desk -- and I'm like -- to give a sense of
24 how not comfortable I am or like how I'm
25 trying to be professional and whatever, so

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I'm still sitting at this chair facing the coffee table and I'm like turned watching him at his desk, because I'm like I'm not going to just get up. And then he's like oh, you can get up and move your chair, and that's what I get up and move my chair. Like I'm not like walking around his office. I felt very out of my elements, very uncomfortable, particularly after his comments about my life and my past.

13 And then he continues to talk
14 about the speech and kind of stops and I
15 try to like change the subject, and I
16 explain that I've been thinking about this
17 moment of me sharing my story at Hamilton
18 as this like kind of transformation in my
19 life and that watching him in these press
20 conferences, it seems like there's a
21 similar transformation happening in his
22 life, and not that those two are at all on
23 par with each other, but like I really was
24 like trying to what in this moment is he
25 feeling, just the virus is super

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1 emotional. We're like on TV every day,
2 the office has changed dramatically, COVID
3 was so emotional for me. At that time I
4 was like I can't imagine what he's going
5 through and I'm writing a speech about my
6 own kind of like turning point in my young
7 life and like kind of raised this question
8 of what right now are you thinking.

10 And that didn't go well, because
11 he interpreted it as we asking whether he
12 was running for president. He kind of did
13 the like what are you asking, just ask
14 what you're asking. And I was like no,
15 I'm really just wondering. I don't know
16 if he did answer that at all. He totally
17 missed what I was even trying to say or
18 like a larger reflection on thousands of
19 people dying every day kind and kind of
20 went to like the fact that he's unhappy
21 and stressed and he can't sleep and really
22 what he wants is to like find someone,
23 like find a lady and drive his motorcycle
24 into the mountains kind of thing.

25 | And then I think we also at that

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2 point touched on if he was losing -- why
3 he was losing viewers in his press
4 conferences. And I think the conversation
5 kind of wound down from there, and Melissa
6 walked in and that's when I -- like so
7 much time had passed that people had
8 showed up to the office, so I just like
9 walked out.

10 As I was getting up, he handed
11 me a PowerPoint to give to the PowerPoint
12 team, so I grabbed that, and ran to the
13 PowerPoint team and kind of like threw it
14 at them, was very upset, and I believe
15 went back to my hotel room to like get
16 dressed.

17 Q. Did you tell anyone at the time
18 about that conversation?

19 A. I told Staffer #2 [REDACTED].

20 Q. Anyone else?

21 A. Not off the top of my head can I
22 remember, but I wasn't very secretive.

23 Q. Did you talk to Staffer #2 [REDACTED]
24 about it, or did you text him, or
25 something else or both?

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2 A. I texted him and talked to him
3 about it, so both.

4 Q. And if you turn to tab
5 twenty-two, those are texts with Staffer #2?

6 A. Yes.

7 Q. And did you talk to him after
8 this text exchange?

9 A. I'm sure I did.

10 Q. And what was Staffer #2's response
11 when you spoke to him?

12 A. I think he -- I don't remember
13 it particularly well, but I feel like
14 there was a general sense of just
15 frustration towards the Governor as like a
16 baseline feeling for staff. So I'm sure
17 he was just like, you know.

18 Q. What was causing the baseline
19 frustration?

20 A. Just I think his personality and
21 like what we touched on earlier of the
22 dynamics of the office and the fact that
23 it was also a pandemic, so it was just
24 stressful and emotional, and I think Staffer #2
25 particularly was doing so much, so I think

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2 he was having his own time of it.

3 MS. CLARK: Why don't we take a
4 ten-minute break before we get to the
5 next stage.

6 So if we could take us off the
7 record.

8 THE VIDEOGRAPHER: Sure.

9 The time is approximately 2:53.
10 We're going off the record.

11 (Whereupon a break was taken)

12 THE VIDEOGRAPHER: The time is
13 approximately 3:10.

14 We're back on the record.

15 Q. We just discussed the
16 conversation you had in mid May with the
17 Governor.

18 What was the next conversation
19 or encounter with the Governor where
20 anything notable happened?

21 A. The next interaction I had with
22 the Governor was June 5. This was the day
23 of the most serious allegations that I've
24 shared with you.

25 I was in the office. It was a

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2 Friday. Stephanie asks that [REDACTED] Executive Assistant #2 and I
3 grab legal pads and masks and pens and
4 recorders and go back to work with the
5 Governor, dictation.

6 So the two of us go back there,
7 and we're both sitting across the desk
8 from the Governor and we make some small
9 talk. He asks about -- this was odd to
10 me, too, because [REDACTED] Executive Assistant #2 had been working
11 for him for a while, but he asks about her
12 name and if she was named after [REDACTED]
13 [REDACTED], and then they start talking about
14 like the classic poster of [REDACTED] [REDACTED].
15 It was like a weird topic. Totally fine.

16 He starts speaking and [REDACTED] Executive Assistant #2
17 goes first, he asks her to go first, and
18 she's dictating, the recorder is on, and
19 he stops himself mid sentence to comment
20 on the fact that my mask goes in and out
21 as I'm breathing and it reminds him, he
22 says, of the monsters, like the aliens in
23 Predator, which is not a movie I seen, but
24 I like Google imaged it obviously after
25 the fact, and he's kind of laughing about

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2 the mask.

3 And then he makes a comment, you
4 know, if I were investigated for sexual
5 harassment, you know, what would I say. I
6 told her she looked like a monster, and
7 then started laughing. The last time I
8 had seen him he had made this really
9 inappropriate -- these really
10 inappropriate comments about sexual
11 violence in my past. Like I was already
12 on guard. And then when he mentioned
13 sexual harassment, it felt like he tripped
14 a wire almost, a total red flag. And I
15 was kind of like sitting there realizing
16 he had maybe just said more than he wanted
17 to say. I'm like, okay, I'm going to be
18 alone with him because Executive Assistant #2 going to
19 finish her piece and then she's going to
20 leave, and we'll go from there.

21 He continues speaking. She's
22 still dictating but it's on police reform,
23 and this is June 5, so this right after
24 George Floyd's murder, and Executive Assistant #2 leaves.
25 And at this point I'm alone with him, and

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2 the first time I've been alone with him
3 since the previous interaction we just
4 discussed. And the timeline of events is
5 a little bit confusing for me because I
6 was in and out of his office. But I
7 dictate and I'm writing, and then he
8 finishes, so I'm like preparing to depart,
9 and he strikes up a conversation with me
10 and he was like, oh, how was your speech.
11 And we kind of like start chatting and
12 then he was like, oh, turn off your
13 tape-recorder. And I'm like, oh, all
14 right.

15 So I turn off my tape-recorder
16 and we're talking about the speech and how
17 it went and that it was on my [REDACTED]
18 birthday, so we're kind of talking about
19 my birthday and we're talking about COVID.
20 And he kind of launches into like -- I was
21 like, how are you, he was like, yeah, I'm
22 lonely and I'm tired and I can't sleep,
23 and he's kind of starts lamenting the fact
24 that work isn't great right now, there's a
25 pandemic. And then he asks me -- he's

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2 like, I haven't even hugged anyone in so
3 long, like I can't even hug anyone. I was
4 like, well, what about your daughters.
5 Your family has been here, and so that was
6 kind of my mention. He was like, no, no,
7 not like that, like a real hug. And that
8 to me was a very obvious like no, not like
9 a warm hug, he's talking sexually.

10 And then he turns to me and he
11 asks like who did you hug last, that kind
12 of like turn the table on me, and I was
13 like, you know, it's been really hard
14 because my parents are high risk and I was
15 quarantined with them now, when I go to
16 see them, I can't even go inside without a
17 mask and we mostly stay outside and I
18 can't even hug them. And he was like, no,
19 no, no, like really hug, really hug, like
20 how long has it been. I was like, oh, you
21 know, it's been a while. He was like,
22 yeah, right, like that was kind of the
23 answer he was looking for.

24 And he starts talking about how
25 he wants a girlfriend and preferably in

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the Albany area, and in the same series of conversations, which the order for me is it is so jumbled and I felt like so much is happening, but he asks me if I had ever been with an older man and I answered that honestly, and then he asked me if I thought age mattered in relationships, and I took a really long -- like I took a pause and I was like about -- kind of going on about power dynamics in relationships, and he cut me off and he was like, well, I don't think they matter, I don't think they matter. And then he mentioned that he would -- he was like anyone over the age of twenty-two. It was either twenty-two and up or older than twenty-two, and I've obviously made statements in the past about this exact interaction, but I'm not exactly sure how it was worded. But he made it clear that twenty-two was some type of cap for his intimate relationships. At the time he was sixty-two. And I just said, oh, like your daughters, and he ignored me on that.

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2 And in the same series of
3 conversations we -- he asked me if I -- he
4 asked me when my last relationship was and
5 I had it had been several months ago, like
6 before the pandemic, and he asked how long
7 that had long on. I said about six
8 months. And he asked if that was
9 monogamous to which I said like kind of,
10 like yes and no. And he took that to be
11 -- the way the conversation went was we
12 interpreted that to mean that I was
13 practicing -- the person I was with was
14 practicing monogamy but I was not, and he
15 interpreted this as -- in the context of
16 my other relationship in which like my
17 former partner [REDACTED] [REDACTED] [REDACTED]
18 [REDACTED] [REDACTED]

19 And then he alluded to the fact
20 that perhaps I need to get over my past
21 and recover from the things that have
22 happened to me, whether it's my former
23 partner [REDACTED] [REDACTED] and the sexual
24 violence piece that I had previously
25 talked to him about, and that I need to

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2 have control in relationships, but I also
3 don't want to be pinned down, which is why
4 I want people to be monogamous to me even
5 though I'm sleeping around, which is --
6 like I didn't even say that was the case.
7 He was kind of elaborating on these things
8 that I wasn't elaborating on. And then he
9 said that I would -- like once I healed, I
10 would have like a more serious
11 relationship.

12 And I did speak on monogamy, but
13 I tried to keep it very theoretical of
14 like I do think that people do enter
15 monogamous relationships for the wrong
16 reasons and that it can often be about
17 control and possession and ownership and
18 just like this automatic reflex to go to
19 that point of monogamy with someone simply
20 because that's more comfortable, but that
21 in fact it should be based more in trust
22 and honesty and conversation and
23 communication, and sometimes those pieces
24 get skipped, and like that conversation he
25 didn't want to have. And kind of like him

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2 cutting me off when he kind of like wanted
3 to take another turn here, turn there.

4 And he also asked in the same
5 series of conversations if I had trouble
6 being with people, are to which I said
7 yes, and I didn't elaborate too much, I
8 just said it's a work in progress for me,
9 and that it's, you know, it will -- yeah,
10 it takes a lot of work, this takes a lot
11 of work.

12 I'm trying to think of the other
13 things that he touched on.

14 At one point I know we were
15 talking about my birthday and that kind of
16 thing, so then I like showed him a picture
17 of the tattoo that I wanted to get for my
18 [REDACTED] birthday, which at the time I
19 couldn't get because of COVID, and that
20 was my way to kind of like change the
21 topic. And then he told me that I
22 shouldn't get it on my shoulder but I
23 should get it on my butt, and he said that
24 several times. He felt that it was safer
25 so people wouldn't see it if I were

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2 wearing a dress.

3 He asked me about my piercings
4 and I said that I have sixteen, like I
5 showed him my ears which I have a lot of
6 piercings on my ears and he asked if I had
7 piercings anywhere else, to which I said
8 no. And then I just was like what about
9 you and he said no, like it was really
10 painfully awkward. And like I didn't
11 really know how to respond to some of
12 these points. Some of them I responded
13 more in like theoretical terms. Others
14 was like the awkward tattoo diversion.
15 Others I answered just straight up
16 honestly about my life, sexually or
17 otherwise.

18 It was between him asking me if
19 I would or have I slept with an older man
20 in combination with all these
21 conversations about my romantic life and
22 my sex life and the fact that he was
23 willing to sleep with someone my age as we
24 had explicitly discussed the fact that I
25 had turned twenty-five, it was very clear

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2 to me that he, over the course of these
3 conversations, was propositioning me for
4 sex, and then also in these same
5 conversations we talked about Black Lives
6 Matter and press conferences. And I was
7 at this point fully, fully aware of what
8 was going on and fully freaked out and
9 needed to get out of the office as soon as
10 possible, but the conversation took place
11 in two parts in which part of it
12 happened -- I went back to my desk to
13 continue doing work and then I was like
14 called back in, and so I was in this loop
15 of talking to him and trying to work and
16 like texting my friend, and it really -- I
17 wish I had a more linear description of
18 this conversation, but I -- it's almost
19 impossible to know how he even jumped from
20 question to question.

I don't know if I'm explaining
this well.

Q. How did you feel at the time?

24 A. I felt really uncomfortable, but
25 I was very sensitive to the fact that I

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1 C. Bennett
2 was -- I was scared and I was
3 uncomfortable, but I also was acutely
4 aware that I did not want him to get mad.
5 I know him, I've seen his temper, I've
6 heard it, I've worked with him for a year
7 now, and I was trying my best to get
8 through the conversation, and I was really
9 like focused almost just on the question
10 he was asking me, because I was --
11 otherwise I would have been like really
12 freaking out. But I was really like very
13 low energy and a little bit like almost
14 glum, because he mentioned it the next day
15 that I was very low energy in this
16 conversation and asked me why.

17 Q. We'll get to the next day in a
18 minute.

19 After the conversation with the
20 Governor, did you speak to anyone in the
21 office about the conversation?

22 A. I didn't have much work, but the
23 conversation went on for a significant
24 period of time. So when I exited the
25 conversation in the office with the

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Governor, I walked by Stephanie's desk, and she was at her computer, did not turn around, and said something to the effect of what were you doing back there so long or were you working the whole time or what were you talking about. It was some question of what was that. And I like turned to face her, but she never even turned around to look at me, she was still facing her computer, and I just said he asked me questions about the protests and the press conferences, and she just didn't reply, and I walked away. At that point I was extremely freaked out and I am on the verge of tears, and I walked back across the hall to where the EAs, where our desks are, and [redacted] Executive Assistant #2 sees me and I'm visibly upset at this point. And she asked me what was wrong and I just said like I think Stephanie is mad at me, and that was really -- she's like -- she like didn't really understand what was happening, but I just didn't want to elaborate. I think I may have said he was chatty or

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2 something, but I really didn't go into it.
3 And I like ordered lunch and never got to
4 eat it, so I'm like trying to eat this
5 sandwich but I'm trying also not to cry
6 and I'm like texting my friend.

7 The interaction with [REDACTED] was
8 very memorable because I felt like I don't
9 act like that in the office and things
10 don't rattle me quite -- like Stephanie
11 could be mad at me and I wouldn't be
12 crying, you know.

13 Q. Did anyone else see you in the
14 office being upset that afternoon?

15 A. Not that I can remember.

16 Q. And you mentioned you were
17 texting with your friend.

18 Was that your friend [REDACTED]?

19 A. Yes.

20 Q. And why don't you turn to tab
21 twenty-three.

22 And is this the texting that you
23 were doing with her that day?

24 A. Yes.

25 Q. And on the first page, you

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2 talked about you were going to burst into
3 tears, this world is a horrible place, and
4 then you wrote, "why is everyone racist."

5 What is that a reference to?

6 A. I tried to talk to him about
7 Black Lives Matter. At the time, I was,
8 as was the world, very upset and I was
9 actively frustrated with his response and
10 he asked me about it in this interaction
11 and I told him he should show up at a
12 protest and his comments were confirmation
13 to me that he didn't really understand the
14 issue or care enough about it. It was
15 upsetting on top of everything else.

16 Q. On the next page she writes,
17 "oh, fuck, are you okay," and you wrote,
18 "I feel like think of what you think it
19 could be."

20 What were you referring to
21 there?

22 A. I was trying to be cryptic but
23 really was saying nonsense. I would say
24 that [REDACTED] really didn't like my job,
25 though I don't know what she would be

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2 guessing this would be about.

3 Q. And on the next page you wrote,
4 "talked about age difference in
5 relationships" and then "no, but it was
6 like the most explicit it could be" and
7 she wrote a series of "oh, my Gods," and
8 like him, him, the him, and you wrote,
9 "him, him, him."

10 That was a reference to the
11 Governor?

12 A. Correct.

13 Q. And on the next page you wrote,
14 "yes, like shaking."

15 Were you shaking after the
16 encounter?

17 A. Yes.

18 Q. On the next page you say, "I'm
19 going to take tomorrow off."

20 That was the Saturday?

21 A. Correct.

22 Q. And then if you turn to the page
23 further on at Friday, June 5 at 5:13 p.m.,
24 you wrote, "sorry, still fucking here. So
25 upset."

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2 Were you still stuck at work at
3 that point?

4 A. I was still stuck at work at
5 that point.

6 Q. And then if you continue on, you
7 continued the text Saturday morning. You
8 wrote, "was in a coma sleep and then I got
9 a need these six briefings in sixty
10 minutes. So deeply upset. Ran to the
11 office."

12 Was that the next time you saw
13 the Governor?

14 A. Yes.

15 Q. So why don't you tell us about
16 what happened in that conversation -- in
17 that encounter.

18 A. I really didn't plan to be in
19 the office and I didn't really didn't plan
20 to be alone with him again, and I
21 literally went to bed, woke up, and then I
22 was back in the office alone with him
23 again. And this was, you know, one of
24 those you just get a horrible e-mail.

25 And I run to the office and I'm

1 C. Bennett
2 like, all right, I can just fix up these
3 briefings, print them out, drop them, and
4 I can get out of there. And then
5 Stephanie walks into the room and she sees
6 me and she goes oh, good, you're here.
7 And I swear to God, my heart dropped.
8 Thinking back I was like I should have
9 picked a different office, even just like
10 a different computer to do my same work
11 just so like I wasn't seen.

12 Anyway, that's irrelevant.

13 She was like, oh, good, you're
14 here, which means -- I almost knew in the
15 moment she's going to ask me to go back
16 there again, and she did. She was like
17 okay, can you come back. And it was just
18 me this time. And it was Saturday
19 afternoon, so there weren't that many
20 people around. I'm back there. It's
21 behind the trooper manned door. I'm
22 sitting at one of the EA desks, so I don't
23 see the Governor. He is back in his
24 office. Stephanie is in her office,
25 Melissa's in her office, so it's just the

1 C. Bennett
2 two of us behind this door. And I'm
3 sitting there, sitting there, and then
4 they tell [REDACTED] Executive Assistant #2 that she can go or there
5 was something where like [REDACTED] Executive Assistant #2 came to
6 the door and handed me like my bag and my
7 purse and stuff, because I was just like
8 I'm camping out back here.

9 And then Stephanie and Melissa
10 leave and go to the Governor's pool, and I
11 was -- I realized in that moment that I'm
12 baby-sitting him this afternoon and he's
13 just in his office. I didn't know what he
14 was doing, and I hadn't seen him, but I
15 had this moment of like I'm fully alone
16 with him, there's like barely anyone here,
17 there's no one behind this locked door
18 besides the two of us, and my whole plan
19 was basically to never see him again,
20 though I had not enacted any plan because
21 I was asleep between the two interactions.
22 That was when I think it really like hit
23 me the graph tee of the situation that I
24 was in and I really don't have any control
25 over my life or my location and that this

1 C. Bennett
2 was a lot more serious and a lot more out
3 of control, a lot more out of my control.
4 And that's when I start texting [REDACTED] that
5 I'm outside his door and freaking out.

6 He calls me back at one point to
7 help him with his phone. There were two
8 times he called me back, and I don't
9 remember the order. In one he -- it might
10 be here. But in one he was trying to get
11 from app to app and couldn't navigate his
12 iPhone, so I just showed him how to switch
13 apps. And in a second instance he thought
14 his phone was dying and it's plugged in,
15 fully charged, and he's asking me why it's
16 dying and I said it's fully charged, it's
17 a full battery with a charge symbol. What
18 I realized at the time was that he was
19 dictating into his notes app the book that
20 he was writing and just like didn't know
21 how to work his phone. But I was sitting
22 there that afternoon babysitting him
23 helping with his phone while he's sitting
24 in his office so he can write his book.
25 And also that like each time I have to

1 C. Bennett
2 walk behind his desk to help him with his
3 phone, it's like not a thing I've had to
4 do before because I like never see him use
5 his iPhone, it was like a first for me.
6 I'm fully aware that I'm walking behind
7 his desk and that like closing space.
8 Like I was closer to him in this
9 interaction than I was even the day before
10 because I was like at least just sitting
11 on the other side of his desk where he'd
12 have to get up and walk towards me. In
13 this, I was literally like standing over
14 him.

15 And then I just -- at one point
16 he was like thanks, that's it, and I was
17 like I can go, this is all you need, and
18 he was like no, I meant like just go sit
19 back down. I was like I'm going to get
20 out of here and he was like no, please sit
21 back down, like I'm not done.

22 And then finally, I'm still
23 freaking out and sitting at this EA desk,
24 he calls me back a third time and he's
25 packing up, and it was like clearly like

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2 the end of the day and he's closing out
3 and he's like, did you find me a
4 girlfriend yet, referencing the previous
5 conversation about trying to find a
6 girlfriend in the Albany area and I was
7 like nope, not yet. And I don't remember
8 what he said. I was wearing jean shorts,
9 but like very like long and baggy and like
10 nothing inappropriate, like I felt
11 comfortable enough. Though I wouldn't
12 choose to wear jean shorts in front of the
13 Governor, I didn't feel like I was dressed
14 like -- I'm not dressed like I'm at a
15 beach party or anything like that, very
16 appropriate jean shorts and he tells me I
17 look like Daisy Duke. And I think I even
18 admitted that I didn't know who that was.

19 And then he left, and I just --
20 like I think it was just -- it was almost
21 scarier than the day before, because it
22 was just a reminder of again the lack of
23 control that I had and the fact that like
24 I promised myself I wasn't going to be
25 alone with this person and I immediately

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2 was and I had nothing -- nothing I could
3 do.

4 I don't know, it may have been
5 Jill. I'm not sure. Usually it's Jill,
6 Annabel, or Stephanie that needs the
7 briefing, but I couldn't say for sure.

8 MR. KIM: I just asked who had
9 called her in that Saturday morning.

10 MS. CLARK: Were you going to ask
11 another question?

12 MR. KIM: Was that how they
13 normally called you in? Or how did
14 they normally call you in, by a PIN or
15 a text message, or how did they do it?

16 THE WITNESS: At that point
17 everyone else had -- we were using
18 iPhones, so I was no longer receiving
19 PINs by the pandemic. I believe it
20 was an e-mail. But I could get a text
21 from Annabel. But traditionally it
22 would be an e-mail.

23 MR. KIM: Thank you.

24 Q. Anything else you recall that he
25 said in that conversation on the sixth?

1 C. Bennett

2 A. That he commented on my low
3 energy from the previous day and asked me
4 if it was because I was hungover, because
5 he actually asked me what I had done the
6 night before and I said I went to bed at
7 7:30, and then that was like he was oh,
8 you were low energy, you must have been
9 hungover, or something to that effect.

10 Q. In your text with [REDACTED], and
11 it's hard to direct but because it's not
12 paginated, but at one point on the sixth
13 you text to her, "I need to talk to Jill"
14 and then in all caps "immediately."

15 Is that a reference to Jill
16 Desrosiers?

17 A. Yes.

18 Q. And is that the first time you
19 considered going to Jill?

20 A. Yes.

21 Q. And why did you think Jill was
22 the appropriate person to go to?

23 A. I trusted Jill. She was my
24 boss, and Annabel was also my boss, but I
25 had no trust, fate, or rapport with her.

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2 But Jill -- at that point I really trusted
3 Jill, and she was a serious person.

4 Q. And we'll come to your
5 conversations with Jill in a minute.

6 On the next page you texted to
7 ████████, "I had a second round interview
8 this week, and they loved me, so there's a
9 chance."

10 Who did you have the interview
11 with?

12 A. I think it was the Council of
13 State Governments. I just maybe made that
14 up. It was -- it was an organization that
15 did prison reform.

16 Q. And a little further down you
17 write, "I've been waiting for almost two
18 hours." She wrote, "he's not stupid, he
19 knows what he's doing." You wrote, "he
20 knows" in all caps. She wrote, "he's so
21 fucking manipulative and now it's like so
22 blatant." And you wrote, "this is
23 definitely what he did to Senior Staffer #3 ."

24 Is that a reference to Senior Staffer #3
25 ████████ ?

1 C. Bennett

2 A. Yes.

3 Q. And what were you referring to
4 when you said, "this is what he did to
5 Senior Staffer #3?"

6 A. I just had this moment of
7 clarity in which the possibility and
8 realistic -- like the realistic
9 possibility that they had a relationship
10 and how it may have started, and in some
11 ways I like pitied her in that moment
12 because she started in the administration,
13 that was like her first job was with New
14 York State and thinking that like someone
15 younger or less confident or a different
16 person would be sitting there with a
17 different mindset or somehow encounter
18 this same man and think that it's
19 exciting.

20 Q. You talked about the time where
21 the Governor called you bun for a while.

22 Did the Governor have any other
23 nicknames for you at any point in time?

24 A. So one thing I did forget to
25 mention is that he also, in the June 5

1 C. Bennett
2 conversation, he complimented my makeup
3 and he said he liked my eyeliner and I
4 think I called them wings, because that's
5 what they're called, and a few days after
6 that conversation he called me Wings. I
7 think it was that Monday following.

8 Those are the only two -- he
9 called me Lot was the main nickname that
10 he used.

11 Q. Did he ever refer to you as Miss
12 Char-A-Latte?

13 A. Yes.

14 Q. How many times did he do that?

15 A. I'm not sure a number.

16 Q. And do you recall the context in
17 which he did it?

18 A. No, I do not.

19 Q. Did you ever have your picture
20 taken with the Governor?

21 A. Yes.

22 Q. And when you did, where did he
23 place his hands?

24 A. Around my waist.

25 Q. And was it the middle of your

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2 waist, high, low?

3 A. I don't remember.

4 Q. Did where he placed his hands
5 during any photos ever make you
6 uncomfortable, or did you think it was
7 inappropriate where he placed his hand?

8 A. Looking back, yes, definitely
9 uncomfortable. Those photos make me
10 extremely uncomfortable. But again, I
11 think I was focused on seeing him as more
12 of a father figure mentor than in the
13 moment it was not something I picked up
14 on.

15 Q. Did the Governor ever give you
16 any copies of photos that had been taken
17 of the two of you together?

18 A. No.

19 Q. Did you ever send the Governor
20 pictures of yourself?

21 A. No.

22 Q. Did the Governor ever ask to see
23 your Instagram account?

24 A. No.

25 Q. Did you ever show the Governor

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2 your Instagram account?

3 A. No.

4 Q. Did you ever engage in any
5 conduct with the Governor that you would
6 consider to be flirting?

7 A. No.

8 Q. And we're asking some questions
9 because we don't know what the Governor is
10 going to say.

11 Did you ever have a romantic or
12 sexual relationship with the Governor?

13 A. No.

14 Q. Other than what you've already
15 described, are there any people who worked
16 in the Chambers or former employees of the
17 Chambers that you told about the
18 Governor's conduct when it was happening?

19 A. I told -- so Jill Desrosiers,
20 Judith Mogul, Staffer #2 [REDACTED], [REDACTED] [REDACTED],
21 Staffer #3 [REDACTED], [REDACTED] [REDACTED], [REDACTED]
22 [REDACTED] [REDACTED] [REDACTED]. There may
23 be others.

24 Q. And [REDACTED] [REDACTED], did you tell
25 her after you started working with her?

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2 A. Yes.

3 Q. And [REDACTED] [REDACTED], what, if
4 anything, did he say in response?

5 A. He was upset to hear it. I
6 don't remember exactly what he said in
7 response. I think we had a longer
8 conversation. I saw Lindsey's tweets in
9 December and had reached out to [REDACTED],
10 because I didn't know Lindsey. And I had
11 actually reached out to Lindsey, but
12 separately from that I kind of wanted to
13 know from my friends what Lindsey's
14 rapport error was generally, just for my
15 own peace of mind, and he was one of the
16 people I reached out to.

17 Q. And what did he tell you about
18 Lindsey?

19 A. He said he believed what she was
20 saying, and I don't even remember what
21 else he said. I think we talked a little
22 bit about the political implications of me
23 involving myself with her. He suggested
24 that -- and I don't remember the order of
25 this, but we had talked at that time about

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2 me coming out with my story and that I was
3 like kind toying with the idea but like
4 ultimately did not want to do it and was
5 still very raw from this. It was in
6 December and I had officially left in
7 November. And this may have even been the
8 first time I found out about the fact
9 that's why I left. I'm not sure even when
10 I told him.

11 But he said -- he's like,
12 listen, don't even make a decision, just
13 write it down. I didn't down what you
14 remember, write down who knows, like put
15 it somewhere and think about it, you don't
16 have to make a decision, and we kind of
17 had that conversation.

18 Q. Other than the conduct you
19 described between you and the Governor,
20 were you aware of the Governor engaging in
21 any inappropriate conduct that was not of
22 a sexual nature, not relating to sexual
23 harassment?

24 A. I was frustrated by the mix of
25 public and private work. I was

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2 unimpressed by the way the off was run in
3 that respect, and thought it was an
4 inappropriate overlap of state staffers
5 and campaign efforts.

6 Q. I think we're leaving that
7 subject to other folks.

8 If you could turn to tab
9 twenty-five. It's more of your texts with
10 Staffer #5 .

11 A. Oh, God. Yeah.

12 Q. Where it looks like you wrote to
13 him, "you leave for one day and the
14 Governor drops the N-bomb," and that's in
15 October of 2019.

16 What was that in reference to?
17 Or is he saying that to you? It's hard to
18 tell.

19 A. It's difficult to tell. I think
20 he said that to me, but I easily could
21 have texted that to him.

22 I remember texting with him that
23 day, because I went to [REDACTED] there was a
24 concert that my brother and I were going
25 to -- he lives in [REDACTED]. So I went up

1 C. Bennett
2 there and was working remotely, and he was
3 on the radio that day. So I obviously
4 listened. And he said the N-word on the
5 radio. And also making the case that he
6 is trying to make this comparison between
7 Italians and black people and he uses that
8 word, and just like one of those days
9 where I was like should I just quit? It's
10 embarrassing, it's embarrassing for
11 everyone.

12 | yeah, I remember that day well.

13 Q. Other than on the radio, did you
14 ever hear the Governor use the N-word?

15 A. No, but I remember being
16 frustrated with the way he spoke about
17 black people when we were -- this was when
18 we were talking about -- I don't know if
19 it was vaping or if it was some sort of --
20 what we were doing in the fall. But we
21 were talking about menthol cigarettes.
22 Not me, sorry, he was having a meeting
23 with a bunch of folks, I think Dr. Zucker
24 was there, and I just heard him ask about
25 what the blacks thought about menthol

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2 cigarettes, how they would react, and it
3 felt like he would make those comments
4 sometimes that is not the way you speak
5 about black Americans.

6 And it was after this, obviously
7 before George Floyd, but yeah, just kind
8 of the -- it was kind of the same way I
9 wrote off the way he spoke to me in that
10 January conversation about sexual violence
11 whereas I feel like you're totally out of
12 -- like you're living in the 1950s and you
13 don't know what you're saying, but that
14 ultimately you can't write it off because
15 he's the Governor of New York and it's
16 just inappropriate.

17 Q. Now, we saw on the text to [REDACTED]
18 that on that Saturday you said, "I have to
19 talk to Jill immediately."

20 After that Saturday, what
21 happened between then and when you
22 actually did speak to Jill Desrosiers?

23 A. What happened between, sorry?

24 Q. Yes.

25 A. I had a very long conversation

1 C. Bennett
2 with Staffer #2 [REDACTED] in which I explained the
3 contents of my conversation from -- with
4 the Governor from the fifth and then also
5 I definitely mentioned the fact that I
6 found myself behind closed doors with him
7 on the sixth. And it was very much Staffer #2
8 sitting there silently as I just kind of
9 let loose what was a combination of
10 sadness and anger. And then I got in my
11 car, it was probably 11:00 at this point,
12 got in my car and drove back to the city.

13 And then I staffed the Governor
14 in the city, which is when -- it was very
15 quick, he came in, did the press
16 conference, left. But I was sitting in
17 Stephanie's seat because she didn't fly
18 down and he referred to me as Wings. That
19 whole staffing experience I was just like
20 this is it, just get through this one day,
21 you'll get back to Albany, you'll get out
22 of this situation, like this is just kind
23 of like hold it down, it will be quick,
24 and it was.

25 | And then my next stop was to my

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2 parents. I think I spent the rest of that
3 day in the city and the next day I drove
4 to my parents' on my way to Albany. That
5 was Tuesday. I texted them in advance,
6 said are you guys both around, my dad is
7 working during the day but obviously he
8 was remotely at that point because of
9 COVID, can he step away, he's on Wall
10 Street, he's a trader, so I feel like
11 there are times when he just like
12 literally cannot get up from his desk.
13 But I just said I need -- will dad be able
14 to just get up and I'll have this
15 conversation with both of you kind of
16 thing.

17 And arrived and waited for them
18 both to sit down, and then I explained the
19 Governor asked me about my sex life, he
20 wanted to know if I slept with older men,
21 and just kind of gave them the very top
22 line, and they are both upset. And I just
23 said like I'm on my way to Albany, I'm
24 going to go talk to Jill, and I just
25 needed you to know because I might come

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2 home without a job and I need to tell you
3 this in advance, like what the possibility
4 is, to prepare you.

5 And they were both pretty upset.

6 They asked me to call my aunt, who is a
7 lawyer, just to kind of get someone else's
8 perspective on what I was about to do. So
9 I called her from [REDACTED] and we spoke for
10 maybe ten minutes. [REDACTED]

MS. KATZ: Charlotte, I'm going
to interject at this point.

21 To the extent that this person
22 is giving you legal advice and you
23 were relying on her for legal advice,
24 I don't think you should get into
25 that, and I would also ask that that

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2 be stricken from the record here.

3 MS. CLARK: We can move on.

4 Q. So after you spoke to your aunt,
5 what happened?

6 MS. KATZ: And that doesn't
7 exactly deal with my concern, which is
8 I don't want any arguments of waiver
9 of privilege, so I'm going to move to
10 strike that. That shouldn't be in the
11 record.

12 And Charlotte, I'm going to
13 direct you not to go into
14 communications with anybody -- a
15 lawyer that dictated how you would
16 proceed.

17 MS. CLARK: We're not seeking to
18 waive the privilege.

19 MS. KATZ: I understand, of
20 course, but I think other people who
21 might have access to this transcript
22 at some point may see that
23 differently, so I'd like that to be
24 stricken from the record so there's no
25 indication of waiver, because there is

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2 none.

3 MS. CLARK: I think you've made
4 your record clearly.

5 Q. Charlotte, after you spoke to
6 your aunt, what happened?

7 A. I drove up to Albany and I got
8 there right at six because Tuesdays at six
9 was my standing appointment [REDACTED] [REDACTED]

10 [REDACTED]. And I explained to her what
11 had happened on Friday and that I was
12 going to go talk to Jill, or just -- I
13 don't even know how far we had gotten.

14 Yeah, it was like an hour of --
15 it was like I have nowhere to turn was the
16 theme of the conversation.

17 Q. And was your Trooper #1 [REDACTED] by
18 phone?

19 A. Yes.

20 Q. So after [REDACTED] [REDACTED] [REDACTED],
21 what happened?

22 A. I prepared to talk to Jill the
23 next day and then it was Wednesday and I
24 decided I would talk to one more person
25 about my decision, and so I texted [REDACTED]

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2

[REDACTED] just to see if he would discuss --
it was like we should go for a walk and
talk.

5

Q. And what was [REDACTED] [REDACTED]
role at the time?

7

A. He was the deputy director of
[REDACTED] [REDACTED] [REDACTED].

9

Q. Did you take a walk with [REDACTED]?

10

A. I took a walk with [REDACTED]. We
went across the plaza. And I just
explained like the Governor wants to have
sex with me and here are the things that
he said, and now I'm trying to figure out
what to do, and it's at least clear to me
that I can't be in this job anymore. I'm
not showing up to his house, I'm not
waiting for him when he's in the office,
I'm not doing this, so I need to -- this
can't happen again. And he agreed that
Jill was probably my best bet. So I was
like all right, I'm going to talk to Jill,
and so I went and I snagged Jill at the
end of the day and it was a really quick
conversation in which she could tell I was

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2 upset when I sat down. We were in her
3 office and I just top line -- I was like
4 listen, I love you guys, everything is
5 fine, but I can no longer serve in my
6 position, the Governor crossed a line with
7 me last week, and I can no longer serve in
8 this position. And she asked me what
9 happened and I just gave her top line, the
10 same top line. And she said okay, and
11 asked me basically if I wanted to move to
12 an agency or if I wanted to just like a
13 different job or what. It was a very
14 quick conversation.

15 Q. When you told Jill, did she seem
16 surprised?

17 A. She seemed surprised, but
18 looking back, it was such a short and -- a
19 short conversation with such a specific
20 solution that it felt very like
21 insignificant in the larger operations of
22 the office maybe.

23 Q. Did she ask you any questions,
24 like details of what happened between you
25 and the Governor?

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2 A. Nothing past just me shooting
3 out a few examples of him asking me if I
4 slept with older men, he said he would
5 sleep with younger women, that kind of --
6 I gave very brief rundown, and that was
7 enough for her to say like okay, well,
8 that's inappropriate and I'm sorry, and we
9 kind of had like a -- I don't know, I'm
10 sorry.

11 Q. She said that's inappropriate
12 and she said she's sorry?

13 A. Yeah, like in the meeting she
14 definitely validated the fact that it was
15 inappropriate behavior.

16 Q. Did she say anything to you
17 about making any sort of formal complaint?

18 A. No.

19 Q. Did she tell you whether she had
20 to report it to anyone?

21 A. No.

22 Q. Did she talk to you about
23 retaliation and you being protected from
24 retaliation or anything along those lines?

25 A. No.

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2 Q. Prior to this conversation, had
3 you ever spoken to Jill Desrosiers before
4 about possibly leaving Chambers?

5 A. Yes.

6 Q. When she asked you if you wanted
7 to work for an agency or go somewhere else
8 within the structure, what did you tell
9 her?

10 A. I said I was fine to stay in
11 Chambers, but I didn't want any
12 interaction with him.

13 Q. Anything else you recall the two
14 of you discussed during that meeting?

15 A. I think we discussed my general
16 interests, like women's health and
17 possible jobs.

18 Q. How did the meeting end?

19 A. She told me to return on Friday,
20 so two days.

21 Q. Did you speak to anyone about
22 that meeting after it happened?

23 A. I told [REDACTED], I told my parents,
24 I later told Staffer #2 [REDACTED], and I just had
25 mentioned that night when I told [REDACTED]

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2

Staffer #3, Staffer #4 [REDACTED], [REDACTED], and then

3

Staffer #2 [REDACTED] was there, I mentioned I spoke to Jill and I got a new job.

5

Q. And just to confirm, is tab twenty-six texts that you sent to [REDACTED] after you spoke to Jill? It starts with [REDACTED], I'm sorry, a few pages in.

9

A. Yeah.

10

Q. And is tab twenty-seven texts you had with your parents after the meeting with Jill?

13

A. This was the conversation -- this was following the conversation when I followed up with her two days later.

16

Q. Before we get to that, did you have a follow-up conversation with [REDACTED]?

18

A. I definitely did.

19

Q. And what do you recall you and [REDACTED] discussed after you spoke with Jill?

21

A. I think I just gave him a rundown.

23

Q. And so you said it was two days later.

25

Did you follow up with Jill, or

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2 did Jill follow up with you?

3 A. I followed up with Jill. I
4 actually poked my head in her office -- it
5 was like it's Friday, I just need to know
6 what's going on because I'm still in this
7 job, it's been a week doing this, and I
8 poked my head in and she kind of had that
9 like almost a moment of like recognition.
10 And I don't know if she said like come
11 back later or she couldn't talk right
12 then, but it was almost like this moment
13 where she saw my face and she needed to do
14 what she said she was going to do, which
15 also makes me think that it wasn't a big
16 deal because she literally forgot until
17 she saw me again that we were supposed to
18 meet and she was supposed to have answers
19 to the questions that I posed on
20 Wednesday.

21 Q. And so did you speak with her
22 later that day?

23 A. I spoke with her later that day,
24 but I actually ran into [REDACTED] [REDACTED] in
25 the hallway before I spoke with Jill and

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2 [REDACTED] was like I just talked to Jill,
3 you're going to join my team, I'm so
4 excited. So then I went into Jill later
5 towards the end of the day and she was
6 like you'll be joining the health team.
7 And then I just said I want to be doing
8 women's health and LGBTQ health and she is
9 like, yeah, that and other stuff, and we
10 kind of talked and I thanked her and was
11 still probably emotional and I'm sure -- I
12 think she still just -- she was like being
13 kind. And then that was like I think a
14 fairly short conversation as well.

15 Q. And was that your last day
16 working as an executive assistant?

17 A. Yes.

18 Q. When did you start in the health
19 role?

20 A. Monday the fifteenth.

21 Q. So the following Monday you
22 started your new job?

23 A. Yeah.

24 Q. Did you say good-bye to the
25 other executive assistants?

1 C. Bennett

2 A. I think at one point I went in
3 there and like told them I was leaving,
4 but it was very abrupt, and I don't
5 remember exactly when.

6 Q. Did you tell them why you were
7 leaving?

8 A. I didn't tell them the actual
9 reason, and they knew, referring to the
10 job interviews that I had had outside of
11 New York State government, they knew that
12 I was trying to something something
13 movement professionally, so I tried to --
14 I don't know exactly what I said, but they
15 were kind of like oh, congratulations,
16 because I was like interviewing for other
17 jobs, so I didn't really address it in an
18 honest way.

19 Q. Did you tell them whether --
20 that Jill had anything to do with moving
21 over to working in the healthcare?

22 A. I probably did because I feel
23 like Jill would be important in that
24 decision.

25 Q. And so the following Monday you

1 C. Bennett

2 started healthcare.

3 Where were you physically
4 located at that point?

5 A. I was located on the other side
6 of the Capitol in the other hallway. I
7 just took a desk, like no one was around
8 because of COVID, so I just like took a
9 desk close to [REDACTED].

10 And then I don't think [REDACTED]
11 even -- she didn't know I was starting,
12 and so Monday we had a meeting and then
13 she asked me maybe in that afternoon
14 meeting, she kind of got into work late,
15 not that she started working late but she
16 started working first thing in the morning
17 and then was able to drive her car from
18 one location to the other in the middle of
19 the day. We talked later in the day on
20 Monday and she asked me when I was
21 starting and I said today is my first day,
22 and she was like oh, okay.

23 Q. After you switched over to
24 healthcare, did you ever see the Governor
25 again?

1 C. Bennett

2 A. I was invited to his pool party,
3 which is not -- it was more just beverages
4 and snacks in his pool house. I was not
5 on the actual like invitation, which was
6 an e-mail thread. But the day of the
7 party, like maybe two hours before the
8 party started, I got a call from Stephanie
9 inviting me to the party that I didn't
10 know about until she called me. And I
11 reasoned that I would have to go to make
12 it look like everything is fine, and I was
13 really at that point concerned about
14 keeping up appearances generally but also
15 with the Governor, because I at that point
16 was hoping that he didn't know what
17 happened and I told Jill in both of these
18 meetings like I really didn't want him to
19 know that I had said anything. And I'm
20 remembering now that on the fifth he also
21 mentioned again the cone of silence.
22 That's just an aside. And I just remember
23 like even the idea of breaking that cone
24 of silence to me -- like I just wanted
25 everything to seem fine, so I was like I

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2 have to go to this party.

3 And so I texted [Staffer #2] to
4 be like is this a party, this is a real
5 thing where people are arriving at his
6 house and I'm not going to show up and be
7 there and no one else is going to be
8 there, and he confirmed that there was an
9 event.

10 So I showed up at his house at
11 noon and, when he eventually arrived or
12 like made his entrance, he like really
13 didn't acknowledge me and I was like
14 standing in a line with other -- I don't
15 know who else. We just like hugged, but
16 it was bizarre and uncomfortable, and he
17 like didn't even acknowledge me at all. I
18 think it was more because there was like
19 no one to greet a line of people without
20 pretending to greet me first and then
21 greet the next person and then greet the
22 next person.

23 Q. Did Jill or anyone else ever
24 tell you what, if anything, anyone told
25 the Governor as to why you disappeared

1 C. Bennett

2 from staffing him?

3 A. On the Friday conversation, the
4 follow-up conversation with Jill, she
5 asked me if she could tell Stephanie and
6 Melissa and I really didn't want her to,
7 but I understand that she was kind of like
8 I have to say something, and she said she
9 would say like that they had an awkward
10 interaction or something along those
11 lines. I was like okay, but I really
12 don't -- just say I really don't want him
13 to know, I really just want to -- this is,
14 you know, as little as possible. Like
15 everything is fine. Like I just -- like
16 trying to back away as slowly as possible
17 without rocking the boat and like -- so
18 when I got the call from Stephanie
19 inviting me to the party, like it was very
20 bizarre.

21 Q. After you stopped being an
22 executive assistant, other than when
23 Stephanie called you to invite you to the
24 party, did you have any discussions with
25 Stephanie?

1 C. Bennett

2 A. We had some e-mail exchanges. I
3 was still helping the briefing team,
4 because one of the briefers took vacation
5 and I was still helping like drop things
6 off, and they kept putting me on e-mail
7 chains, so there was some of that.

8 Q. After Jill told you that she was
9 going to tell Stephanie and Melissa
10 DeRosa, did you have any conversations
11 with Melissa DeRosa?

12 A. At the end of the pool party I
13 was sitting next to her, but she was not
14 addressing me specifically.

15 I actually e-mailed the two of
16 them after the pool party ended. I mean,
17 this is how hard I was trying to make it
18 seem like everything was totally fine. I
19 e-mailed Stephanie and Melissa after the
20 pool party being like you are amazing
21 women that hold up New York State and I
22 can't imagine -- like it's such an honor
23 knowing you. It was like the most kiss
24 ass e-mail I've ever written in my whole
25 life and I was just sitting there like

1 C. Bennett
2 feeling disgusting but like really the
3 most olive branch whatever I could
4 possibly craft in a single e-mail. And
5 they both replied the next day like very
6 kind messages, like, oh, Charlotte, that's
7 so kind of something bullshit, and then
8 that was really it.

9 Q. And when's the next time, if
10 ever, you spoke to anyone in senior staff
11 about what happened with you and the
12 Governor?

13 A. After that, I was -- Jill
14 brought me into her office on June 30 and
15 told me that I needed to tell Judy Mogul
16 the entire story from the first day I
17 started at the Chamber.

18 Q. And what time of day was it on
19 the thirtieth?

20 A. Right before 6:00, [REDACTED] [REDACTED]
21 [REDACTED] [REDACTED] [REDACTED].

22 Q. And when Jill told you you had
23 to tell Judy Mogul, was that before or
24 after you went out with the group of
25 people, Staffer #4 [REDACTED], Staffer #3 [REDACTED], et cetera,

1 C. Bennett
2 and told them about your interactions with
3 the Governor?

4 A. It was the next day that she
5 called me.

6 Q. So you went to -- it was at her
7 office?

8 A. Yes.

9 Q. And she said you needed to tell
10 Judy Mogul, did she tell you why?

11 A. She just said she needed someone
12 else to understand the events. She didn't
13 explain too much.

14 Q. Did she tell you why the
15 conversation was happening on June 30 when
16 you had last spoken to her on June 12?

17 A. No, she did not.

18 Q. And did you -- was Judy then
19 brought into the meeting at that point?

20 A. Jill called her on an iPhone and
21 put her on speakerphone.

22 Q. And how long did your
23 meeting/call with Jill and Judy last?

24 A. Over an hour, at least.

25 Q. And what do you recall was said

1

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2

by -- by the three of you in that meeting?

3

A. She -- Judy apologized and just said, you know, I know this is a lot, this is hard, but you're going to have to explain as much as you can remember about your relationship with the Governor, interactions you had, conversations you had from the moment you were hired. And I launched into I started on January 24, 2019 as this title all the way to present day. And Judy was taking notes and interjecting with questions. And then at the end I just said so what's the -- you know, what's the deal, and like what is this. And she just said I don't know, I need some time to look this over.

18

Q. You said she was taking notes.

19

How do you know she was taking notes?

21

A. She said she was creating a chronology, and she would often pause, refer back to things. I think there may be a point or two at which she asked me to slow down.

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2 Q. And you said she asked you
3 questions.

4 Do you recall any of the
5 questions that she asked you?

6 A. I don't remember specific
7 questions, but they were mostly clarifying
8 questions as I shared all the same
9 information that I've shared with you
10 today.

11 Q. And did Ms. Mogul or Ms.
12 Desrosiers say that they were going to
13 report what you shared to anyone else?

14 A. No.

15 Q. Did she explain the complaint
16 procedure to you at all?

17 A. No.

18 Q. Did she talk to you about
19 retaliation or assure you you wouldn't be
20 retaliated against?

21 A. No.

22 Q. I'm going to ask you to look at
23 tab twenty-eight.

24 Are these texts -- text exchange
25 between you and [REDACTED] after you had your

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1 C. Bennett

2 meeting with Jill and Judy?

3 A. Yes.

4 Q. And on the first page, the first
5 thing you wrote was, "toxic positivity."

6 What was that a reference to?

7 A. Her [REDACTED] was teaching her
8 about toxic positivity as it related to
9 her relationship with her mother.

10 Q. On the next page you wrote,
11 "dude, Jill just pulled me into her
12 office. [REDACTED] said she had never seen
13 Jill even in the health team's office
14 before."

15 Is that something that [REDACTED]
16 [REDACTED] told you?

17 A. Yes.

18 Q. Did you have any conversation
19 with [REDACTED] [REDACTED] about the meeting you
20 had with Jill and Judy after you had it?

21 A. I returned to my desk and [REDACTED]
22 -- after my call with Judy and Jill and
23 [REDACTED] was still there, so she asked me
24 what Jill was doing in her office, why she
25 pulled me out, and what took so long. And

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2 I explained that I had a call with Judy,
3 and that was when I basically said, you
4 know, I never want to be alone in a room
5 with the Governor again and that's why I'm
6 working for you now, and I just had a
7 whole conversation with Judy about it.

8 Q. And what, if anything, did [REDACTED]
9 say when you said you had to talk about
10 all that with Judy?

11 A. She seemed shocked and upset,
12 but also just reiterated like how excited
13 she was to work with me. We had worked
14 obviously together in a different capacity
15 and she just wanted to make sure I was
16 okay and said she looked forward to the
17 team and just kind of was checking in on
18 me.

19 Q. On the next page you wrote,
20 after talking with [REDACTED] about talking
21 with the Chamber, "she was nice and she's
22 very well-respected and I really
23 appreciated the way she went about it."

24 Is that a reference to Judy?

25 A. She is, though I don't stand by

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1 C. Bennett

2 that statement.

3 Q. Do you stand by any of it or
4 part of it, or what's your view on that
5 statement today?

6 A. She was nice and she is very
7 well-respected in the office. I don't now
8 appreciate the way she went about it,
9 mostly because it was just not how she's
10 legally required to handle this.

11 Q. And you wrote, "and I just said
12 I will do anything to make it not a
13 problem."

14 Is that something that you said
15 to Jill and Judy?

16 A. Yes, several times.

17 Q. Did you -- other than your text
18 with [REDACTED] and you talked to [REDACTED]
19 [REDACTED], did you speak to anyone else
20 about the meeting?

21 A. I probably -- oh, I described it
22 to [REDACTED] [REDACTED]. He told me I should be
23 writing everything down and I should find
24 a lawyer.

25 Q. Anything else that you and [REDACTED]

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1 C. Bennett

2 discussed?

3 A. No. He was just concerned
4 generally.

5 Q. In your meeting, did Judy ask if
6 the Governor ever touched you?

7 A. I don't remember.

8 Q. Did she ask if the Governor ever
9 made any sexual advances towards you?

10 A. I don't remember.

11 Q. Did Judy Mogul ever make any
12 comments along the lines of you took
13 control before anything could happen?

14 A. The next day she -- I texted her
15 the next day just being like -- so
16 backtrack.

17 The next day I get an e-mail
18 from [REDACTED], and it was just like
19 you might want this, something along those
20 lines, and it was a link to the employee
21 handbook, which I had not yet seen, and I
22 freaked out. So I texted Judy like what's
23 going on, like have you made up -- what is
24 happening; right? Like I'm just what's
25 going on. And she was like can we get on

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2 the phone with Jill.

3 So we get on the phone and she
4 just said the way you described it as
5 grooming is actually so accurate and seems
6 like you really stopped it, like you
7 really nipped it in the bud, and it didn't
8 rise to the level of sexual harassment, it
9 was only grooming, so we don't do anything
10 about this, and I really think the way you
11 handled this was -- she complimented the
12 way I handled it and said that if she had
13 -- I don't know if she has a daughter, but
14 she was just like I hope that's how my
15 daughter would handle this. And I was
16 like thanks. And she was like it sounds
17 like you had a friendship, or like she
18 made some reference to my relationship
19 with the Governor, and I just tried to
20 like still backpedal, I was like yep, it
21 was a friendship, I don't know what
22 happened, just still trying to soften
23 everything, because I was still terrified.
24 And they were just like okay, yeah, yeah,
25 yeah, and then that was the whole phone

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1 C. Bennett

2 call.

3 Q. And am I correct in
4 understanding, in the first conversation
5 you had with Jill and Judy, you made
6 reference to the Governor grooming you and
7 in the second one she picked up on that
8 and said, yeah, it was just grooming, or
9 something along those lines?

10 A. Correct.

11 Q. Did -- in any of those
12 conversations did Jill or Judy tell you
13 that there were counseling services
14 available for you, or an EAP program?

15 A. Not that I can recall.

16 Q. And so am I correct that Judy
17 said it wasn't sexual harassment so she
18 didn't have to report it to anyone else,
19 or something along those lines?

20 A. Yes.

21 Q. Did Judy tell you in the second
22 conversation that she was very familiar
23 with the handbook?

24 A. Yes.

25 Q. Did she tell you that she was

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1 C. Bennett

2 very familiar with the law in this area?

3 A. Yes.

4 Q. And did she tell you -- is that
5 when she said that it was not sexual
6 harassment because you stopped it before
7 it got to that point, or words to that
8 effect?

9 A. Yes.

10 Q. Did she ask if you agreed with
11 that, that you had stopped it before it
12 crossed into sexual harassment?

13 A. Yes. I basically just agreed
14 with whatever. I was really, really
15 trying my best to show them that I wasn't
16 a threat of my kind, to the point of where
17 even [REDACTED] had you just told them the
18 whole story, like begin to end, and I was
19 like I really am -- like I'm really trying
20 to put all my cards on the table, I'm not
21 trying to like -- I'm trying to be the
22 least adversarial I can ever be, like
23 thanks, everyone, for all your hard work.
24 I don't know, I just really -- I was just
25 trying to be the most agreeable, least

1 C. Bennett

2 rocking the boat I could possibly be.

3 Q. In the July 1 conversation, did
4 Jill or Judy tell you that filing your
5 complaint was an option for you?

6 A. No.

7 Q. Did either of them tell you
8 that, if you wanted to bring any sort of
9 complaint, that you'd be protected from
10 retaliation?

11 A. No.

12 Q. Did Judy tell you that she
13 thought you were very courageous?

14 A. Yes.

15 Q. Did they ask you any questions
16 about your new job?

17 A. Yes, they did.

18 Q. What did they ask you about your
19 new job?

20 A. They asked if I was happy about
21 it.

22 Q. And anything else you recall
23 that was said in the July 1 follow-up?

24 A. I think I described it as a
25 dream job.

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2 MR. KIM: Can I ask a follow-up
3 question? Can you hear me on the
4 video?

5 MS. CLARK: Yes.

6 MR. KIM: You mentioned earlier
7 that you were sort of terrified.

8 What were you terrified --
9 during that call, what were you
10 terrified of?

11 THE WITNESS: I didn't think any
12 person I had talked to at any point,
13 as nice as they were, were going to
14 protect me from anything at all at any
15 point.

16 MR. KIM: And were you afraid of
17 the Governor at that time?

18 THE WITNESS: Yes.

19 MR. KIM: And what about -- what
20 made you afraid of the Governor? What
21 were you afraid he might do, or what
22 might happen if he knew about it?

23 THE WITNESS: Well, I certainly
24 expected to lose my job, and that was
25 a real possibility is what I told my

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2 parents. I was scared to even see him
3 in the hallway, which was a rare
4 occurrence anyway. I was honestly --
5 I was just terrified. I don't even --
6 I feel like I sat next to senior staff
7 as they worked and I have no concept
8 of how far they'd go to protect him
9 and didn't want to find out.

10 MR. KIM: And are you afraid of
11 him today as well, or what he might
12 do?

13 THE WITNESS: Yeah.

14 Q. Other than what you've already
15 described, did you have any other
16 conversations around this time with [REDACTED]
17 [REDACTED] about your conversations or the
18 complaint procedure or what you might do?

19 A. I don't remember particulars,
20 just that he was concerned about my
21 approach and really thought I needed a
22 lawyer.

23 Q. And [REDACTED] sent you the employee
24 handbook, and that was the first time you
25 had seen it?

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2 A. Correct.

3 Q. Did he just send it to you or
4 did you ask him for it, or how did that
5 come about?

6 A. He later told me that Judy asked
7 him that day to find the handbook.

8 Q. So after he found it, he sent it
9 not just to Judy but to you?

10 A. Correct, because he already knew
11 at that point the conversation I had had
12 with Judy, so he was aware of the context
13 in which she was asking.

14 Q. So your understanding was that
15 Judy asked for the handbook between your
16 June 30 and July 1 conversations?

17 A. Correct, and happened to ask one
18 of the few people who knew exactly the
19 conversation she had had with me the night
20 before.

21 Q. After July 1, during that
22 summer, did you continue to work in the
23 healthcare group? Sorry, you had moved in
24 June, and so then you were working with
25 ██████████ during the summer; is that

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1 C. Bennett

2 correct?

3 A. Correct.

4 Q. Just in general terms, what sort
5 of work were you doing?

6 A. I was really trying to get a
7 grip on where I could be useful and was
8 doing a lot of, you know, introductory,
9 like this is Charlotte, this is what she's
10 going to be working on, Charlotte meet
11 this team, they do X, Y and Z, a lot of
12 those intro calls within different
13 agencies within the department. But I
14 ultimately didn't really have much work
15 and didn't really do much at all.

16 Q. And did you report to [REDACTED]
17 [REDACTED] the whole time you were in the
18 healthcare group after that?

19 A. She found out the first week or
20 so of July that she was being pushed out
21 of her position, and then she cancelled
22 everything on her calendar and she was
23 very hard to get in touch with, which I
24 don't blame her for at all, I feel like
25 that was a normal response to what she was

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2 dealing with at that time, but it left me
3 with no guidance and no direction and any
4 kind of day-to-day format we were creating
5 as a team fell apart, and then I really
6 didn't have much to do. So that -- the
7 work with [REDACTED] really lasted the
8 fifteenth through the first week of July.

9 Q. And after that, did you do work
10 with anyone else in the department?

11 A. I tried. I worked with [REDACTED]
12 [REDACTED], who was [REDACTED] right hand. I
13 worked with -- I tried to talk to people.
14 At one point I even went over to DOH and
15 had some meetings. Her replacement
16 started, so I had like two new bosses and
17 I had meetings with them, and I really was
18 like trying to -- trying to work through
19 the emotional state that I was in. I was
20 not in a good place. I was anxious and
21 felt really isolated. I was like paranoid
22 to a certain extent about my proximity to
23 certain people and who knew what and I was
24 lying to people, I was telling some people
25 the truth, I didn't know who to trust, and

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I had no idea what was going on, no one explaining to me like the work and, when they were, it was like I had no space in it because no one had had my job previously, so I'm supposed to carve my own way with two new bosses who also have never worked in state government and they didn't know what was going on either. It was the most depressing, chaotic -- there are two issues. My struggle to realize and like come to terms with what happened with my job and then also just the external -- the Department of Health as being like carved from the inside out, everyone's leaving, people are retiring, you know, the dynamics of the Executive Chamber's relationship with the Department of Health has its own issue, so I was stuck in both.

21 Q. Who were the two replacements
22 for [REDACTED] [REDACTED] ?

23 A. [REDACTED] and
24 [REDACTED].

Q. And you said starting early July

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2 [REDACTED] sort of cleared her calendar.

3 Did you have any further contact
4 with her after that?

5 A. I did, and we talked about the
6 new hires, we talked about ways I could
7 get back, you know, find my like niche in
8 the team. We talked about leaving and how
9 she was going to help me get another job,
10 either in the Chamber or outside the
11 Chamber. I really -- I think we had
12 several different conversations about like
13 where am I going to go to.

14 Q. In the fall of 2020, did [REDACTED]
15 have any conversations with you about
16 anything that needed to be kept
17 confidential?

18 A. Can you repeat that?

19 Q. Sure.

20 During the fall of 2020, did
21 [REDACTED] at any point reach out to you to
22 talk about something and say it was
23 something that needs to be kept
24 confidential?

25 A. Not that I can remember. It was

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2 mostly me looking for professional and
3 personal help.

4 But are you referring to
5 something in particular or --

6 Q. I'm not.

7 A. Okay.

8 Q. And did [REDACTED] and [REDACTED]
9 remain [REDACTED] replacement throughout the
10 rest of the time that you were there?

11 A. I took [REDACTED] leave beginning
12 of September, returned the end of
13 September, and when I went -- I returned
14 simply to quit, and upon quitting to
15 [REDACTED], she quit to me -- [REDACTED] quit
16 as I was quitting and we kind of laughed
17 and I was like yeah, I'm going to kind of
18 like leave the state for a while and she
19 was like I'm going to spend more time with
20 my family. And then I heard after the
21 fact that there were a lot of problems
22 with the Governor as it related to her and
23 [REDACTED] and that he kind of let his temper
24 loose, which was also like him expecting
25 two new hires who have never worked in

1 C. Bennett
2 government to fix the Department of Health
3 within a few weeks, you know, one of those
4 things beyond the realm of physics.

5 And then I like -- that was my
6 first quit upon returning to [REDACTED], and
7 then the rest of the quits, which are to
8 like [REDACTED] [REDACTED], Jill Desrosiers took
9 several weeks.

10 Q. Why did you decide to quit upon
11 your return from [REDACTED] leave?

12 A. I figured out pretty quickly
13 into [REDACTED] leave that like I was
14 miserable and suffering and my [REDACTED] was
15 worse. I was -- I lost my confidence, I
16 was teary, I was anxious, I think
17 [REDACTED] [REDACTED] [REDACTED], which that's
18 like -- I had my first good night's sleep
19 of my adult life in September of 2020.

20 And I just -- like that fact
21 alone is that I did all of 2019 and the
22 first majority of 2020 without actually
23 sleeping, that [REDACTED] [REDACTED] [REDACTED] [REDACTED]
24 [REDACTED] [REDACTED] and been dealing with this
25 bullshit is just like not the thing that I

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2 needed to hear because I was already like
3 anxious and like traumatized and didn't
4 really even had a job, just like had a job
5 title. If I turned my phone off, who
6 would have noticed. That's kind of how it
7 felt. Like this isn't even worth it.

8 And to be honest, I hated the
9 fact like everything had to be about the
10 Governor, which I know is what happens
11 when you work in the Executive Chamber and
12 also just in New York State government,
13 but I just like -- I had no interest. Not
14 only did I have no confidence but I had no
15 interest in expending any energy as it
16 related to him. Not that I could because
17 I didn't have a job, like a real job.

18 Yeah, I was just angry and sad
19 and really needed to extract myself from
20 that.

21 Q. You said it took several weeks
22 before you could quit to Jill Desrosiers.

23 Why did it take a few weeks?

24 A. She's really hard to get as in
25 -- I refused to go to Albany. I knew he

1 C. Bennett
2 was up there and I was not going to do it,
3 so every time she came to the city I would
4 like try and coordinate seeing her with
5 her assistant, and it was always like
6 she's busy or she was about to be free or
7 he was like oh, the mood just shifted, you
8 don't want to talk to her right now. It
9 was like impossible to get to her. And I
10 don't think she realized that I was trying
11 so hard to meet with her.

12 Q. And when did you finally have a
13 chance to talk to her about quitting?

14 A. I was sitting in my apartment
15 working on my grad school applications,
16 because at that point I wasn't working. I
17 was just trying to quit and waiting.

18 And I get a call on my work
19 phone, so I answer it, and it was Judy and
20 she said we -- Jill and I both heard a
21 rumor that you're quitting, what is this,
22 is this true, what's going on. And I
23 immediately got emotional, because I
24 didn't know that I was about to pick up
25 the phone and talk to Judy Mogul. And she

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2 kind of apologized and so was like you
3 don't sound great and I was like yeah, I
4 am quitting. And she was like, well,
5 where are you going. I was like I'm not
6 going anywhere, I'm going to school, like.
7 And she was like, well, when, you know,
8 like you're going to be -- like we can
9 find you a job until you go to school.
10 And I was just like I'm looking at January
11 terms, you know, it's October, like it's
12 fine. And she was like if you wanted
13 another job, just -- you should think of
14 that, and I kind of gave her like an okay,
15 I'll think about it, I haven't really
16 thought about it. But at that point I was
17 more just like -- not that she was
18 pressuring me, but I was like yeah, maybe,
19 yeah, I'll put that on my list of things
20 to think about. But I was pretty
21 emotional. And she asked me what was
22 wrong and I explained that I had been
23 [REDACTED] but also that,
24 because she asked, does it have to do with
25 the conversations we had previously about

1 C. Bennett
2 the Governor and I said yes. And she was
3 like I'll let you go, but you sound
4 ██████████, like how can we help you and
5 like I'm concerned, like we can support
6 you. I felt very ambushed and I was
7 pretty emotional and freaked out. But I
8 did explain that I had been trying to meet
9 with Jill, I had been trying to quit for
10 some time.

11 Q. Did you have any understanding
12 as to what Judy meant by saying that they
13 could support you?

14 A. I understood that as finding me
15 a job to take until I started a program, a
16 school program.

17 Q. Did she mention any specific
18 type of job?

19 A. No. She said I should think of
20 something that I want and then let them
21 know.

22 Q. If you could look at tab thirty,
23 some more texts between you and █████, it
24 looks like.

25 Is this after you had your

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2 conversation with Judy?

3 A. Yes.

4 Q. And a few pages in you wrote --
5 she writes, "they just must be terrified
6 that you're going to talk" and then in
7 response to some other stuff you write, "I
8 literally will talk. Give me \$300,000
9 now. Exactly. That's what I tried to say
10 but I was just so caught off guard."

11 What were you talking about
12 there?

13 A. So the I literally will talk,
14 give me \$300,000 now is a joke, because
15 part of my fear of meeting was that they
16 would ask me to sign something and I was
17 going back and forth with my partner, with
18 [REDACTED], I was like are they going to
19 make me sign an NDA and it was this kind
20 of ongoing -- it was like a real thing I
21 thought they were going to pull, and that
22 I was mad and I will share my story and I
23 am. Obviously I wasn't actually expecting
24 \$300,000. It was a very off-color joke.

25 And then the "exactly that's

1 C. Bennett

2 what I tried to say" was about her last
3 paragraph. "The whole thing isn't about
4 them. Even though they've been horrible,
5 it's fundamentally about you and what you
6 need to do on every level." That was what
7 I tried to say; I was like I need to go.

8 Q. And did you ever speak to Jill?

9 A. I did end up meeting with Jill
10 and we -- it was very much, you know, what
11 are we going to go do and I just said I
12 have paid time off, so she was like, well,
13 okay, start your paid time off on Monday,
14 which basically just means I ride out the
15 rest of my PTO. And she asked again about
16 the jobs. She mentioned that there was a
17 program that they might start that had to
18 do with public health that I could be
19 interested in. She was kind and she kind
20 of said like so what happened and I tried
21 to touch on both the team fell apart, like
22 this wasn't a real job, and also that like
23 I was impacted by the sexual harassment.

24 I didn't say the word "sexual
25 harassment," but when I started talking

1 C. Bennett

2 about what happened with the Governor, she

3 kind of cut me off and then restated like

4 oh, I'm so sorry what happened with the

5 team. Which was just like kind of almost

6 I felt like she was rewriting history as

7 the conversation was happening. But at

8 that point I still am just like yep, I

9 have to go. And she was like, listen, I

10 understand, it's been a hard year for

11 everyone, and we're all kind of

12 traumatized and if you need to get out of

13 here, take your space, but we're always

14 here. And if you ever -- like if you

15 decide that you do want something, just

16 let us know.

17 And then I just said thank you,
18 and left.

19 Q. Did you tell Jill how upset or
20 affected you were by your interactions
21 with the Governor?

22 A. Yeah, I said, you know, I'm just
23 -- like I've been really anxious, at this
24 lost confidence, and that's when she kind
25 of redirected to like I'm sorry the team

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2 didn't work out. And I really didn't want
3 to push it with her, but I did make a
4 point to say like I want to get away from
5 him.

6 Q. Did you tell Jill that you had
7 gotten [REDACTED] [REDACTED]?

8 A. Yes, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

9 Q. Anything else you recall in your
10 discussion with Jill?

11 A. I think I just told her that I
12 really look up to her and it was sad. I
13 think I was just sad. Like I felt very
14 much like thank you, you know, I
15 appreciate whatever. I don't know. Just
16 tried to leave it as like I respect you, I
17 appreciate you. I said I didn't want to
18 disappoint her.

19 MR. KIM: Did she say anything in
20 response to your comment you wanted to
21 get away from the Governor?

22 THE WITNESS: She just kind of
23 agreed.

24 MR. KIM: How did she agree?

25 THE WITNESS: I think she just

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2 said yeah, that makes sense. We've
3 had a hard year. I think he was
4 really abusive to her through COVID.
5 I think it had to do with her
6 departure that we had never discussed
7 the two of us but that I had heard
8 rumors about. But I don't think she
9 was particularly pleased with him
10 either.

11 MR. KIM: What rumors had you
12 heard?

13 THE WITNESS: There were times
14 when she wasn't allowed into the back
15 office, and there was a strange
16 dynamic between Jill, Stephanie, and
17 the Governor where like -- I think
18 this existed before COVID, but Jill
19 was like the ultimate punching bag in
20 a lot of ways and took a lot of crap.
21 Where like Stephanie and Melissa work
22 very hard but Jill got like the brunt
23 of the crap, and it was hard for me to
24 like -- I think I'm having a hard day
25 and then I see Jill who like everyone

12 And then I don't know how I
13 found out that she like [REDACTED] [REDACTED] [REDACTED]
14 [REDACTED]. I think it may have been
15 even after there were rumors that she
16 was leaving around when I met with her
17 last, but I don't think I knew it was
18 about [REDACTED] until the day I had
19 stated my PTO.

20 Q. Have you heard from anybody
21 about whether she's going to return from
22 her [REDACTED] leave?

23 A. Just a lot of guessing that she
24 won't.

25 O. And after you had your

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2 conversation with Jill, did you move out
3 of New York?

4 A. I, a few weeks after, got a very
5 small contract, so I had to end my PTO,
6 handed in my phone, and then like a week
7 or two later I left the state and was
8 living in [REDACTED] until April.

9 Q. And what work have you been
10 doing since you left the government?

11 A. I received a very small contract
12 to help a startup with a client and the
13 CEO, it was just her, there are no
14 employees, she just has independent
15 contractors and I was one of them. She
16 asked me to stay and help her with the
17 business, so now it's the two of us and
18 it's a consulting firm and we work to
19 improve health systems and introduce
20 maternity care options into health systems
21 to improve outcomes for birthing people.

22 Q. After the conversations you just
23 described with Ms. Desrosiers and Ms.
24 Mogul, have you had any contact with
25 either of them since?

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2 A. No.

3 Q. After you left, did anyone who
4 was still at Chambers reach out to you?

5 A. Yes.

6 Q. Who reached out to you?

7 A. I heard from -- I think I spoke
8 with [REDACTED] [REDACTED], I spoke to [REDACTED], I
9 think I spoke to [REDACTED]. When [REDACTED] saw
10 Lindsey's tweets, we talked on the phone.
11 I think I had brief conversations with
12 others that I'm not remembering right at
13 this moment. And then when my New York
14 Times story came out, I received texts
15 from like a larger group, but it wasn't --
16 nothing like so substantive more, just
17 like support you texts.

18 Q. After Lindsey Boylan started
19 tweeting in December, did anyone who's
20 current or former employee of the
21 Executive Chamber reach out to you about
22 any sort of response to Lindsey?

23 A. No one that wasn't a friend like
24 [REDACTED] getting on the phone with me to
25 discuss what's going on. But there was no

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2 outreach from any party or any of the what
3 I read in the news about efforts to
4 diminish her.

5 Q. Did anyone who you were friendly
6 with tell you that they had gotten a call
7 asking to sign on to any statement either
8 in support of the Governor or against
9 Lindsey?

10 A. No.

11 Q. Did -- you said you reached out
12 to Lindsey in December.

13 How did you reach out to her?

14 A. I messaged her on Twitter, and
15 then she sent me her phone number and we
16 texted and her -- some staffer of hers
17 scheduled a phone call, and then we spoke
18 over the phone maybe that same week even.
19 And then we spoke several more times. And
20 I -- she wanted me to share my story, I
21 didn't want to share my story, but like we
22 stayed in contact, you know, like we'll
23 share news stories and stuff. Yeah,
24 several times I think she really wanted me
25 to come forward, and I did not want to

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2 come forward.

3 Q. When you reached out to Lindsey,
4 did you share with her your story?

5 A. Yes.

6 Q. Did she ever ask you to meet
7 with any lawyers?

8 A. Yes.

9 Q. And did you agree to meet with
10 the lawyers that she wanted you to meet
11 with?

12 A. I scheduled a Zoom with lawyers
13 and then cancelled it.

14 Q. And did Lindsey tell you what
15 the purpose was of speaking to a lawyer at
16 that point?

17 A. I don't even know if she said
18 why. I think she framed it as me sharing
19 my story. But the fact that there were
20 lawyers that like reached out to me really
21 freaked me out, and I kind of, in a
22 scared, submissive way, scheduled the Zoom
23 and then I talked with [REDACTED] and
24 she was like if you feel weird about
25 something, don't do it, and I was like I

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2 can't make this meeting.

3 Q. Did the lawyers tell you what
4 they were reaching out to you for, what
5 the purpose was of that Zoom call?

6 A. They wanted to know my story. I
7 didn't even tell Lindsey in much detail,
8 just a brief -- it was relatively brief.
9 But they seemed very pushy to hear what I
10 had to say.

11 Q. Do you recall who those lawyers
12 were?

13 A. Doug Wingdor [sic].

14 Q. Wait, Wigdor?

15 A. Yes.

16 And then there was a woman on
17 the e-mail chain who also -- they sent me
18 very kind of long -- not super long, but
19 they sent me follow-up e-mails being like
20 -- it felt like a scare tactic to get on
21 the phone with them.

22 Q. You mentioned that, when Lindsey
23 first started tweeting, you spoke to [REDACTED]
24 [REDACTED].

25 What did the two of you say

1 C. Bennett

2 about Lindsey's tweets?

3 A. I remember [REDACTED] [REDACTED]
4 mentioning Lindsey, and I knew that they
5 had overlapped in Chamber when I had not
6 with Lindsey. So I reached out, just
7 being like -- it was kind of the same
8 thing I did with [REDACTED], like what's
9 Lindsey's deal, and we kind of had a
10 series of texts about who is Lindsey
11 Bovlan.

12 Q. And what did [REDACTED] tell you
13 about her interactions with Lindsey or
14 what she knew about Lindsey?

15 A. She confirmed part of what I
16 remembered, which is that she did have
17 trouble with the senior staff women and
18 that there was some issue between the
19 Governor liking pretty women and senior
20 staff not taking to her.

21 THE VIDEOGRAPHER: Counsel, I'm
22 sorry to interrupt, but at some point,
23 I don't need a break, but just to go
24 off the record for a few seconds to
25 manage the size of the video file.

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2 MS. CLARK: Okay. We can go off.

3 THE VIDEOGRAPHER: Thank you.

4 The time is approximately 5:06

5 p.m.

6 We are going off the record.

7 (Whereupon a break was taken)

8 THE VIDEOGRAPHER: The time's
9 approximately 5:37 p.m.

10 We're back on the record.

11 Q. Now, you mentioned that, when
12 you were working up in Albany, you shared
13 an office with the other executive
14 assistants, and one of them was Alyssa
15 McGrath.

16 When you were still working for
17 the Chamber, did she ever tell you of any
18 experiences she had with the Governor?

19 A. No.

20 Q. Has she got in touch with you
21 since you came public with your story?

22 A. Yes.

23 Q. And what discussions have you
24 had with Alyssa McGrath?

25 A. She was struggling to come

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2 forward and contacted me, shared some of
3 the details of her own account, and asked
4 me what the experience was like, and I
5 explained that, in some ways, it --
6 sharing the truth was obviously painful
7 and there's a whole traumatic element to
8 that, but sometimes saying the truth that
9 you need to share is actually freeing you
10 in a way and I didn't want her to be
11 scared, and just kind of like giving her
12 the support she was looking for in that
13 moment. And we've just, since then,
14 exchanged like kind of like love and
15 support for each other.

16 Q. And by the way, I know when you
17 first got in touch with Lindsey, you
18 didn't want to go public with your story.

19 What made you decide to change
20 your mind?

21 A. Every reason I had to not tell
22 the story was just not good enough. I
23 feel like the reason why I'm -- I was even
24 working for the State of New York was to
25 actually better the State of New York, and

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2 if this is part of that journey, then so
3 be it. New Yorkers deserve to know who
4 they're electing, and I also just needed
5 to do the right thing and it felt like
6 exactly the right thing to do.

7 Q. When you were at the Chamber,
8 did you work with anyone named Kaitlin?

9 A. Last name -- I worked with a
10 Kaitlin but I don't know if it's the one
11 to which you're referring.

12 Q. There's some stories identifying
13 somebody named Kaitlin.

14 Do you believe you overlapped
15 with that Kaitlin?

16 A. I did not overlap with that
17 Kaitlin.

18 Q. And have you had any
19 communications with that Kaitlin since you
20 went public?

21 A. I did, yes.

22 Q. And what were your
23 communications with Kaitlin?

24 A. Very similar, talking about our
25 respective experiences and supporting each

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2 other in whatever decisions we needed to
3 make. I feel like my not job or
4 responsibility but like in that space with
5 someone else, it's like really just --
6 like I want them to do what feels good and
7 right for them, and I just also need to
8 hear them they can survive sharing that
9 information with the public and that the
10 other side is scary, but like I'm still
11 here and Lindsey's still here and that
12 people will always support you. I just
13 try to be really clear in that there is an
14 entire group of people that fully believe
15 what we're saying because it's true, but
16 it's scary. I'm just holding space.

17 Q. And have you spoken with any
18 other current or former executive
19 assistants of the Governor's to see what
20 their experiences were or talk about your
21 experiences?

22 A. I reached out to -- I reached
23 out to I think Executive Assistant #2, I believe Brittany,
24 the woman who replaced me in New York
25 City, her name is [REDACTED]. [REDACTED] said she

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1 C. Bennett
2 didn't have any experiences. Brittany
3 never responded. And [REDACTED] Executive Assistant #2 never
4 responded.

5 Q. And am I correct that you did
6 not overlap with Ana Liss?

7 A. Correct, I did not overlap.

8 Q. Have you had any communications
9 with Ana Liss since you became public?

10 A. I think so, very briefly. I
11 don't have too much. It was kind of like
12 support you, very basic. I don't remember
13 any outstanding.

14 Q. Since you went public with your
15 story, have any other women come forward
16 to tell you about experiences they had
17 with the Governor that we haven't talked
18 about already?

19 A. No.

20 Q. Did you have any interactions
21 with other men in the Executive Chamber
22 that you thought were inappropriate,
23 anyone other than the Governor?

24 A. Yes.

25 Q. And which men was that?

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2 A. I guess, when you say
3 "inappropriate," are you speaking
4 specifically about sexual harassment?

5 Q. More broadly inappropriate.

6 A. I had an argument -- I wouldn't
7 even say it was an argument, it was a
8 really demeaning call in which I realized
9 I -- it felt baked-in sexism to me with
10 ████████ who works in D.C. and
11 has worked with the Governor for a long
12 time. I told Jill about that. And he was
13 just miserable to work with. And when I
14 asked him for the things that he was
15 supposed to do as a part of his job and a
16 part of mine, he got me on the phone and
17 like went after me, and I largely saw it
18 as dismissive because of my age and my
19 gender.

20 Q. And what about the call that
21 made you think it was dismissive in part
22 because of your gender?

23 A. I said you need to let me know
24 what's going on and you need to include me
25 in these e-mail chains, and he basically

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2 told me I don't need to do anything you
3 say. And I was like, well, you do,
4 because this is how it works. And he said
5 that no, and he said you should be
6 thanking me for all the things I've done
7 for you in this administration, just like
8 I don't even work with him day-to-day,
9 he's a D.C. guy. It was so out of left
10 field and so deeply inappropriate, and I
11 raised this to Jill just to be like this
12 is inappropriate and it's difficult to do
13 my job when he withholds information from
14 me because he thinks I shouldn't be on an
15 e-mail chain that Melissa DeRosa's on.
16 It's just kind of the attitude.

17 Q. When did you have that call with
18 [REDACTED]?

19 A. In June of 2020.

20 Q. And did you tell Jill about it
21 around the time it happened?

22 A. Yes.

23 Q. And did you tell Jill that you
24 thought he was being sexist or being
25 dismissive because of your gender, or

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2 anything around those lines?

3 A. I don't think that explicitly,
4 but I said I thought that it was
5 inappropriate and that -- it wasn't the
6 first time that he has been difficult, and
7 I had heard other people explain -- I had
8 heard people in the past relay comments
9 that he had made to other groups of people
10 to me. That was not answering your
11 question.

12 I mostly kept it as like this is
13 impossible to do my job with this
14 behavior, and I thought it was really
15 unprofessional.

16 Q. What was Jill Desrosiers'
17 response when you told her about the call
18 with [REDACTED]?

19 A. She said she would fix it, and
20 then Annabel sent out a chain and was like
21 these people need to be on every e-mail,
22 that kind of like going forward, let's be
23 clear, you need to include these people on
24 the information that you're sending
25 because then we -- you know, it was just

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2 -- we find out at 9:00 p.m. something that
3 they were planning a day prior and then
4 you have to put together a briefing at
5 9:00 p.m. at night because he decided I
6 wasn't supposed to be on the e-mail chain?
7 Sorry.

8 Q. Any other men that behaved any
9 way that you considered to be
10 inappropriate?

11 A. ████████ also comments on the
12 bun that I wore on a different occasion
13 and told me he didn't like how I changed
14 my hair and I looked at a schoolteacher,
15 and I remember telling people about it
16 because I was so sick of people commenting
17 on my bun.

18 Q. Did you say anything to him when
19 he said it to you?

20 A. No.

21 Q. Any other men that behaved in
22 any way you considered to be
23 inappropriate?

24 A. Not that I can remember right
25 now, no.

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2 Q. Did you have any interactions
3 with a state police officer named [REDACTED]
4 [REDACTED] or [REDACTED] that made you
5 uncomfortable?

6 A. Yes. He had messaged me. The
7 troopers were very nice to me, but he had
8 made a point to reach out to me on social
9 media, and I thought it was inappropriate.

10 Q. Why did you think it was
11 inappropriate?

12 A. He was sending me emojis from
13 his beach vacation.

14 Q. Did you ever tell anyone about
15 Trooper [REDACTED] behavior?

16 A. Just [REDACTED].

17 Q. And did [REDACTED] suggest you take any
18 action?

19 A. No.

20 Q. And did you ever report it or
21 complain to anybody about it?

22 A. No.

23 Q. Any other men that behaved in
24 any way that made you uncomfortable or you
25 thought was inappropriate?

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2 A. During COVID, I had a larger
3 issue with the breakdown of
4 responsibilities and the way that certain
5 people were behaving, and it's I think
6 less about names because I actually was
7 friends with those people, but I thought
8 that I was largely the same age and
9 similar experience to the men in the
10 office, but they were all in a room
11 working on content and PowerPoints and
12 data and I was printing that for them to
13 deliver it. I had a larger problem with
14 the roles in which we were placed and the
15 respect that we were given.

16 Q. And do you have a sense as to
17 who made the decision that someone like
18 you would be the one doing the clerical
19 work and that the men would be working on
20 the substance?

21 A. It seemed to come from senior
22 staff and the Governor. It seemed it was
23 baked in the same misogyny that, you know,
24 there was an expectation that I wear
25 heels. It felt like we had gone back a

1 C. Bennett

2 few decades in some ways.

3 Q. Other than things you've already
4 testified to, did anyone engage in any
5 sexually inappropriate conduct in the
6 workplace?

7 A. Not that I could remember right
8 now.

9 Q. If you could turn to tab
10 thirty-three.

11 A. Oh, my God. I'm sorry.

12 Q. This is an exchange -- another
13 exchange between you and [redacted] September 23,
14 2019.

15 Do you recall what the two of
16 you were talking about in this exchange?

17 A. Yes.

18 Q. What were you talking about?

19 A. There was a conference call in
20 which there was someone seemingly having
21 sex -- and these conference calls are
22 large and almost everyone is on mute, but
23 there was someone having sex and people
24 were just continuing to talk over the sex,
25 and it was the talk of the office for a

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2 bit, obviously.

3 Q. And did you have any belief or
4 understanding as to who the person was who
5 was having sex while on a conference call?

6 A. I still believe it was [redacted] Senior Staffer #3.

7 That was the theory and the gossip at the
8 time. But I did not receive any
9 confirmation of this.

10 Q. Was the Governor on the call?

11 A. No.

12 Q. Was Jill Desrosiers on the call?

13 A. Yes.

14 Q. Was Stephanie Benton on the
15 call?

16 A. Hard to say. I'm not sure. She
17 doesn't join every call.

18 Q. Was Melissa DeRosa on the call?

19 A. She rarely joins.

20 Q. Who else do you recall was on
21 that call?

22 A. Senior Staffer #3 was definitely on the
23 call, Jill was definitely on the call,
24 Staffer #4 [redacted] was on the call, most
25 people, you know, it's me, my team, the

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1 C. Bennett
2 advanced team, press usually on that call.
3 But usually the people speaking are senior
4 staff.

5 Q. When you say, "press," you mean
6 the Governor's press team?

7 A. Yes. That's a clarifying point.

8 Q. I think we would have read about
9 that by now.

10 A. I would hope so.

11 MS. CLARK: You can put that
12 aside.

13 Q. Did you ever see the Governor
14 touch somebody, an employee, in a way that
15 you thought was inappropriate for the
16 workplace?

17 A. I cannot name a specific
18 example, but I definitely remember him
19 putting his waist -- his arm around a
20 waist here and there. I remember there's
21 one instance in which Melissa got dressed
22 for a party or a fundraiser of some kind
23 and there was like a stain on her butt and
24 he pointed it out, and it was just kind of
25 one of those bizarre moments, and she

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2 didn't really seem to -- she didn't seem
3 uncomfortable or taken aback by the packet
4 that he was like what's on your butt.

5 Q. Did he touch her at all when he
6 made that comment?

7 A. I'm not sure.

8 Q. Did the Governor hug employees?

9 A. He definitely did.

10 Q. Was it men and women?

11 A. I highly doubt he was hugging
12 men, but I don't know.

13 Q. Did you ever see him kiss any
14 employees?

15 A. No, I don't believe so.

16 Q. Did you ever see the Governor
17 hug or kiss people at events?

18 A. Nothing out of the ordinary
19 jumps out for me.

20 Q. Did you ever hear the Governor
21 say something to somebody else that was
22 sexually suggestive?

23 A. I feel like there was a lot of I
24 would almost say locker room talk but with
25 the mean girls.

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2 Q. What do you mean by that?

3 A. Where I feel like they would
4 have conversations about their lives and
5 relationships with him and each other
6 where it almost sounded like a group of
7 friends talking.

8 Q. And these are conversations that
9 you overheard or were present for?

10 A. Yeah, I was usually sitting at
11 my desk.

12 Q. Did anyone ever tell you that
13 the Governor had touched them in a way
14 that made them uncomfortable?

15 A. No, but somebody at some point
16 mentioned to me that there may be a photo
17 of somebody sitting on his lap, and that
18 -- I don't have the name of the person
19 sitting or the person who mentioned the
20 photo.

21 Q. That was something you were told
22 while you still worked for the Chamber, or
23 later?

24 A. I believe it was when I still
25 worked for the Chamber, and it may have

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2 been even in response to me asking about
3 the relationship between some of these
4 people.

5 Q. The person that you heard there
6 was a photo of them sitting on the lap,
7 was it one of the women that you thought
8 might have had a relationship with the
9 Governor?

10 A. I think so. I suspect it was
11 Senior Staffer #3 or Senior Staffer #2, but I'm not sure.

12 Q. You mentioned, and I forget who
13 told you this, that somebody, when you
14 first switched to the executive assistant
15 position, talked about working for an
16 executive who threw things.

17 Did you ever see the Governor
18 throw anything at anyone?

19 A. No.

20 Q. Did anyone ever tell you about
21 the Governor throwing anything at anyone?

22 A. No.

23 Q. Did you ever see the Governor
24 throwing fruit around the office?

25 A. Nothing comes to mind. But I'm

1 C. Bennett

2 very -- it's possible, but nothing that
3 jumps out at me.

4 MS. CLARK: Joon or Emily or Jen,
5 anyone have any other questions before
6 I move to wrapping up?

7 MR. KIM: Not from me, no, thank
8 you.

9 Q. I know we covered a lot today,
10 and there's times you jumped in and
11 referred back to something you said
12 earlier.

13 Is there anything else you can
14 think of right now that you want to
15 clarify something you said earlier today?

16 MS. KATZ: Can we take a break
17 for just a moment before you close the
18 record?

19 MS. CLARK: Sure. Why don't we
20 take five minutes now.

21 MS. KATZ: Charlotte, if you have
22 anything to say, but I just want to
23 touch base before we close.

24 THE WITNESS: I feel like --
25 well, the one thing I do want to

1 C. Bennett

2 clarify is the sexual harassment
3 training that Stephanie took for the
4 Governor, and just that I don't know
5 if I like did justice in that, like I
6 explicitly heard her say I'm taking
7 this for you as part of the
8 conversation they were having when I
9 was sitting at my desk, and I feel
10 like that was not explicit enough.

11 But that was my only -- the
12 other instance I remember, this was
13 very early on, it may have even been
14 the same say as Danny Boy, he was
15 running around the office with his
16 finger like this (indicating) yelling
17 "redrum" like in The Shining. If
18 we're talking about kind of like
19 outlandish behavior, that comes to
20 mind.

21 MS. CLARK: And for the court
22 reporter -- the video will capture it,
23 but you had your finger crooked like
24 in The Shining.

25 Debbie, do you still want to

1 C. Bennett

2 take a five-minute break?

3 MS. KATZ: Yeah, I just want to
4 touch base and make sure there's
5 nothing more.

6 THE VIDEOGRAPHER: Thank you.

7 The time is 6:00 p.m., and we're
8 going off the record.

9 (Whereupon a break was taken)

10 THE VIDEOGRAPHER: The time is
11 approximately 6:08.

12 We're back on the record.

13 Q. Any other things we talked about
14 that you want to clarify at this point?

15 A. Not at this point, no. I
16 feel --

17 Q. And I told you at the outset if
18 there's any statement you wanted to add,
19 whether it's something we talked about or
20 not, you're free to do so now. You don't
21 have to, but you have the opportunity if
22 you'd like to.

23 A. I didn't think about that, but
24 now that you're saying it, I think my main
25 statement relates to the developments over

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1 C. Bennett
2 the last few months as it relates to the
3 Governor's comments about the
4 investigation, and just my concern
5 watching as he diminishes the work that
6 you're doing and just want to make note of
7 the comments and behavior that we're
8 seeing from him.

9 That's all.

10 Q. And anything in particular you'd
11 like to say regarding the Governor's
12 comments and behavior?

13 A. I think diminishing the
14 investigation, making it something
15 political when it simply isn't, and the
16 fact that he was at one point asking
17 everyone to wait for the findings of this
18 investigation and now is simply saying
19 that we shouldn't have any faith in them,
20 and then he goes back and forth, back and
21 forth, it makes my job, my actual job
22 really hard, it makes my life really hard,
23 and it's simply unenjoyable that he can
24 just choose to ruin my day because he
25 decides to spew bullshit in the middle of

1 C. Bennett
2 a press conference, but also that it is
3 simply damaging to the investigation and
4 not the findings but just it's scary. As
5 a witness, that scares me, and that's all
6 I'll say.

7 MS. KATZ: Maybe you want to tell
8 her why.

9 THE WITNESS: Why it scares me?

10 Q. Yes.

11 Why does it scare you?

12 A. It seems like he -- he has a
13 platform and he has a lot of power, and
14 making comments like that actually is
15 interfering with really important and good
16 work.

17 Q. Have any women told you that
18 they are concerned as witnesses about the
19 Governor's comments or women who have
20 thought about coming forward and are
21 afraid to do so given the Governor's
22 comments?

23 A. Alyssa reached out to me after
24 we released a statement. This was when
25 the Governor said that making someone

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1 C. Bennett

2 uncomfortable is not sexual harassment and
3 Debbie and I responded appropriately, and
4 Alyssa reached out to me afterwards saying
5 thank you for standing up for us.

6 MS. CLARK: Thank you for your
7 time today.

8 If you get any additional
9 information, I'm sure you'll share
10 it with your attorney who will share
11 it with us.

12 I want to remind you again that,
13 if anyone asks you about what we
14 talked about today, you have let us
15 know, and are that you're not to share
16 with us anything that you discussed.
17 That's separate from discussing your
18 underlying issues.

19 And again, just thank you for
20 spending the time with us and talking
21 about things that we know aren't easy
22 to talk about.

23 THE WITNESS: Thank you.

24 THE VIDEOGRAPHER: May I close
25 out the deposition for today?

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2 MS. CLARK: Yes.

3 THE VIDEOGRAPHER: Thanks,
4 everyone.

5 We are off the record at 6:12
6 p.m., and this concludes today's
7 testimony given by today's witness of
8 May 26, 2021.

9 The total number of media units
10 used was five, and will be retained by
11 Veritext New York.

12 Thanks, everyone.

13 (TIME NOTED: 6:12 p.m.)

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CERTIFICATION BY REPORTER

I, Wayne Hock, a Notary Public of the
State of New York, do hereby certify:

That the testimony in the within proceeding was held before me at the aforesaid time and place;

That said witness was duly sworn before the commencement of the testimony, and that the testimony was taken stenographically by me, then transcribed under my supervision, and that the within transcript is a true record of the testimony of said witness.

I further certify that I am not related to any of the parties to this action by blood or marriage, that I am not interested directly or indirectly in the matter in controversy, nor am I in the employ of any of the counsel.

IN WITNESS WHEREOF, I have hereunto
set my hand this 1st day of
June, 2021.

Wayne Arke